

<div>1</div> <div>UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA LAFAYETTE LOUISIANA</div> <div>JACK VENTON VENABLE, JR. * and WILLIAM AGUIRRE, Ind. * and on behalf of all others * similarly situated * VERSUS * NO. 6:16-CV-00241 * SCHLUMBERGER LIMITED * (SCHLUMBERGER N.V.) * fka SMITH INTERNATIONAL, * INC. * *****</div> <div>The deposition of JACK VENABLE, JR., taken in connection with the captioned cause, pursuant to the following stipulations before Sheri Bertrand, Certified Court Reporter, at the Law Offices of Kenneth D. St. Pe', 311 West University Avenue, Lafayette, Louisiana, on September 30, 2019, beginning at 8:57 a.m.</div>	<div>2</div> <div>1 APPEARANCES: 2 3 REPRESENTING PLAINTIFFS, JACK VENTON VENABLE, JR., and 4 WILLIAM AGUIRRE, individually and on behalf of all 5 others similarly situated: 6 7 MR. KENNETH D. ST. PE' 8 THE LAW OFFICES OF KENNETH D. ST. PE' 9 311 W. UNIVERSITY AVENUE, SUITE A 10 LAFAYETTE, LOUISIANA 70506 11 12 13 REPRESENTING DEFENDANT, SMITH INTERNATIONAL, INC.: 14 15 MR. BRYAN E. BOWDLER 16 THE KULLMAN FIRM, PLC 17 1100 POYDRAS STREET, SUITE 1600 18 NEW ORLEANS, LOUISIANA 70163 19 20 21 22 23 24 25</div>
<div>3</div> <div>1 STIPULATION 2 3 It is hereby stipulated by and between counsel of 4 record for the parties hereto that the deposition of 5 JACK VENABLE, JR., 6 is being taken pursuant to notice and in accordance with 7 the Federal Rules of Civil Procedure and for all uses 8 and purposes thereby provided. 9 That all formalities in connection with the taking 10 of the deposition are hereby waived, with the exception 11 of the swearing of the witness, the reduction of the 12 questions and answers to writing, and the reading and 13 signing of the completed transcript of testimony; 14 That all objections, save those as to the form of 15 the question and responsiveness of the answer, are 16 hereby reserved until such time as this deposition, or 17 any part thereof, may be used or sought to be used in 18 evidence, such objections as might have been made had 19 the testimony been given in Open Court. 20 21 * * * * * 22 23 24 25</div>	<div>4</div> <div>1 INDEX 2 EXAMINATIONS: 3 BY MR. BOWDLER 5, 138 4 BY MR. ST. PE' 135 5 6 EXHIBITS: 7 EXHIBIT 1, PETITION 24 8 EXHIBIT 2, EMPLOYMENT APPLICATION 33 9 EXHIBIT 3, LETTER FROM SMITH SERVICES 7/25/12 36 10 EXHIBIT 4, EMPLOYEE MINI FILE 37 11 EXHIBIT 5, SCHLUMBERGER LETTER 9/23/15 40 12 EXHIBIT 6, REMUNERATION STATEMENT 12/27/13 56 13 EXHIBIT 7, REMUNERATION STATEMENT 12/26/14 58 14 EXHIBIT 8, REMUNERATION STATEMENT 10/2/15 59 15 EXHIBIT 9, EXCEL SPREADSHEET 63 16 EXHIBIT 10, JOB LOG 12/3/2014 72 17 EXHIBIT 11, JOB LOG 12/17/2013 73 18 EXHIBIT 12, JOB LOG 9/23/2015 74 19 EXHIBIT 13, SERVICE OPERATOR JOB LOG 79 20 EXHIBIT 14, JOB DESCRIPTION 84 21 EXHIBIT 15, RHINO XS SERIES REAMER OPERATING 22 INSTRUCTIONS 126 23 EXHIBIT 16, TIME RECORD 126 24 EXHIBIT 17, DECLARATION OF JACK VENABLE 133 25</div>

<p style="text-align: right;">5</p> <p>1 JACK VENABLE, JR., 2 after having been duly sworn, was examined and did 3 testify as follows: 4 EXAMINATION BY MR. BOWDLER: 5 Q Good morning, Mr. Venable. My name is Bryan 6 Bowdler. I'm one of the attorneys for Smith 7 International in your lawsuit and we're here for 8 your deposition today. Just to start with, and I 9 know you've been in -- I've taken your deposition 10 before your other loss that you have pending 11 against International, correct? 12 A That's correct. 13 Q Okay, and other than that deposition, have you ever 14 given a deposition before? 15 A No, that was my only one. 16 Q Okay, while maybe you probably remember some of the 17 general stuff, I'll just kind of go over it again 18 today. Just -- I'm gonna ask you a few questions 19 here today and it's your job just to answer them to 20 me -- answer them to the best of your knowledge and 21 truthfully, and you -- 22 MR. ST. PE': 23 One second. I'm sorry. 24 MR. BOWDLER: 25 Sure, no problem. Off the record.</p>	<p style="text-align: right;">6</p> <p>1 (REPORTER'S NOTE: 2 Whereupon an off-the-record discussion 3 was held, after which the proceedings 4 continued as follows:) 5 BY MR. BOWDLER: 6 Q All right, and Mr. Venable, you understand that 7 you've been placed under oath here today? 8 A Yes. 9 Q And you understand that's the same oath you would 10 take as if you were testifying in a court of law, 11 correct? 12 A Yes. 13 Q Okay, and you do understand that the same penalties 14 for perjury apply with respect to your testimony 15 today as you would in a court of law, correct? 16 A Yes. 17 Q As you see, we have a court reporter here that's 18 taking a transcript of everything that we say here, 19 so in response to my questions, I need you to 20 answer my questions verbally and not with nods of 21 your head and things like that, okay? 22 A Yes. 23 Q And, likewise, if you do things like uh-huh, uh-uh, 24 things like that, if you do respond to one of my 25 questions with that, I might just ask you to</p>
<p style="text-align: right;">7</p> <p>1 clarify. I'm not picking on you, I'm just making 2 sure we have a clear record, okay? 3 A Understood. 4 Q Okay, and if you would, please do your best to 5 try and wait until I'm done asking my question 6 before you start to answer, and likewise, I'm gonna 7 do my best to wait til you're totally done with 8 your answer before I ask another question, okay? 9 A Okay. 10 Q If I ask you a question at some point today and you 11 don't understand it, either because I've worded it 12 very poorly and I just asked a, you know, bad 13 question, please tell me so I can rephrase it and 14 ask it in another clearer way, okay? 15 A Okay. 16 Q And if I do ask you a question and you proceed to 17 answer, I'm going to assume that you understood my 18 question fully; is that fair? 19 A That's fair. 20 Q Likewise, in response to one of my questions, I 21 don't want you to guess or speculate. Just, you 22 know, tell me what you know. If you are kind of 23 guessing or speculating, please say so as part of 24 your answer, okay? 25 A Will do.</p>	<p style="text-align: right;">8</p> <p>1 Q During the course of our deposition today, your 2 attorney may object to some of my questions. If 3 so, let him watch his objection for the record, and 4 unless he instructs you otherwise, you can go ahead 5 and answer my question, if you can, okay? 6 A Okay. 7 Q Finally, if there's any point today that you need 8 to take a break for whatever reason, just say so, 9 we'll stop. It's not an endurance contest or 10 anything, so the only thing I'm gonna ask is if I 11 have asked you a question, I'm gonna need you to 12 answer my question before we take a break, okay? 13 A Okay. 14 Q And, Mr. Venable, is there anything today that 15 would prevent you from understanding my questions 16 fully, other than me asking a poor question? 17 A No. 18 Q Anything, as we sit here today, that would prevent 19 you from answering my questions truthfully? 20 A No. 21 Q All right, and, Mr. Venable, what, if anything, did 22 you do to prepare for today's deposition? 23 A I sat in my attorney's office for about ten 24 minutes. 25 Q And just, for the future, if it involves --</p>

<p style="text-align: right;">9</p> <p>1 something involves a conversation with your 2 attorney, don't tell me the contents of your 3 conversation. 4 A That's the only thing I did. 5 Q Okay. And so, I take it, you did not review any 6 documents? 7 A I did not. 8 Q Did you do any kind of independent research into 9 the law that's at issue in this case to prepare for 10 today's deposition? 11 A No. 12 Q Did you do any kind of independent research into 13 other similar claims for overtime by people like 14 yourself -- 15 A I did no research. 16 Q Did you do any kind of research into other overtime 17 lawsuits against Smith or Schlumberger? 18 A Research? No. 19 Q Okay, and aside from your attorney, have you spoken 20 to anybody else about your lawsuit? 21 A In the beginning I spoke to a couple co-workers. 22 Q Do you recall their names? 23 A One is Will Aguirre -- I think that's it, actually. 24 Q Okay, and what -- I guess, what did you discuss 25 with Mr. Aguirre, as long as it didn't involve your</p>	<p style="text-align: right;">10</p> <p>1 attorney? 2 A He's just a personal friend. We just -- the 3 conversation came up. 4 Q Okay, and this was before you filed your lawsuit or 5 after? 6 A Before. 7 Q And what was it you talked about with Mr. Aguirre, 8 just? 9 A I just let him know that -- what was going on -- I 10 mean, we were friends, so we talk often. Like I 11 talked to him about football yesterday. 12 Q Have you spoken with any of your other former Smith 13 colleagues about this lawsuit, other than Mr. 14 Aguirre? 15 A No. 16 Q All right, and if you would, just -- would you 17 state your complete name for the record, please? 18 A Jack Venton Venable, Jr. 19 Q And, Mr. Venable, what's your current home address? 20 A 1418 Verot Road, Lafayette, Louisiana 70506. 21 Q And how long have you lived at that address? 22 A Since around 2006. 23 Q And do you own or rent the property at that 24 location? 25 A I own.</p>
<p style="text-align: right;">11</p> <p>1 Q And what was your address prior to the Verot Road 2 address? 3 A I believe it was 120 Hummingbird Lane, Lafayette, 4 Louisiana 70506. 5 Q And how long did you live at that property, 6 approximately? 7 A Less than a year. 8 Q And did you own or rent that property? 9 A I rented. It was an apartment. 10 Q And, Mr. Venable, do you have a driver's license? 11 A I do. 12 Q And what state issued your driver's license? 13 A Louisiana. 14 Q Do you happen to know your driver's license number? 15 A I would have to look at my driver's license. 16 Q Okay, and, Mr. Venable, what's your current phone 17 number? 18 A 337-281-2326. 19 Q And is that a cell phone number or a landline? 20 A It's a cell phone number. 21 Q And do you have a landline number? 22 A I do, but it's just for the alarm system. 23 Q Okay, and, Mr. Venable, do you have a high school 24 degree? 25 A I have a high school diploma, yes.</p>	<p style="text-align: right;">12</p> <p>1 Q What school did you earn your diploma from? 2 A H.L. Bourgeois in Houma, Louisiana -- or Gray, 3 Louisiana. 4 Q And what year did you graduate high school? 5 A 2000. 6 Q Do you have a college degree, Mr. Venable? 7 A No. 8 Q Have you ever taken any college courses? 9 A I've taken an online class, but I've never 10 completed anything. 11 Q Do you hold any kind of certifications or licenses, 12 other than a driver's license? 13 A No. I mean, Smith sent me to some schools, but 14 that's all expired. 15 Q Okay, and nothing from like a government like 16 certified welder -- 17 A Oh, no, it's like CPR class and stuff. 18 Q Gotcha. Gotcha. And following high school -- what 19 did you do following high school; did you start 20 working, or? 21 A Following high school, I went straight into the 22 military. 23 Q And what branch of the military did you go in? 24 A Army. 25 Q And were you enlisted --</p>

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<p style="text-align: right;">13</p> <p>1 A I was enlisted.</p> <p>2 Q What was the highest rank you earned?</p> <p>3 A E4.</p> <p>4 Q Okay, and I guess when you first joined, what --</p> <p>5 what was it you did in the Army; infantry, or?</p> <p>6 A I was infantry.</p> <p>7 Q You were infantry, okay. And were you in the</p> <p>8 infantry for the entire duration of your service?</p> <p>9 A Yes.</p> <p>10 Q And how long were you in the military?</p> <p>11 A Nine years.</p> <p>12 Q And I guess where were you based out of?</p> <p>13 A So part of that nine years was active. Some of it</p> <p>14 was National Guard. I've been based numerous</p> <p>15 places, Fort Benning, Georgia, Fort Hood, Texas,</p> <p>16 Fort Irwin, California, Germany. I also did two</p> <p>17 tours in Iraq. I was in Kuwait.</p> <p>18 Q And just kind, roughly, year-wise, what point did</p> <p>19 you go into the National Guard?</p> <p>20 A 2004.</p> <p>21 Q Okay, so I guess from 2000, 2004 you were active</p> <p>22 duty military -- Army and National Guard?</p> <p>23 A So I joined as National Guard, but then I was</p> <p>24 activated to Title 10, which is full, active duty</p> <p>25 during that time.</p>	<p style="text-align: right;">14</p> <p>1 Q Gotcha.</p> <p>2 A So it's -- it's a mixture of both.</p> <p>3 Q Okay, gotcha. And, I guess, I know you said you</p> <p>4 were in the infantry, but kind of what,</p> <p>5 specifically -- did you have like a specialty</p> <p>6 within the -- what you did when you served?</p> <p>7 A Throughout my career in the infantry, I did,</p> <p>8 basically, all the aspects of infantry from</p> <p>9 rifleman to heavy gunner. I was a Bradley gunner,</p> <p>10 Bradley commander, Bradley driver, squad leader.</p> <p>11 Q And sorry, just for somebody who is not familiar</p> <p>12 with military, what's a Bradley?</p> <p>13 A A Bradley is a tank.</p> <p>14 Q Oh, it's a tank, okay.</p> <p>15 A Yeah.</p> <p>16 Q Gotcha. Okay, and following your time in the</p> <p>17 military, with whom did you go to work for?</p> <p>18 A After? Numerous companies. I worked for BJ</p> <p>19 Services. I worked for Schlumberger. I worked for</p> <p>20 Baker Hughes. Some of those are multiple times.</p> <p>21 I've worked multiple times for BJ and multiple</p> <p>22 times for Baker and multiple times for</p> <p>23 Schlumberger/Smith.</p> <p>24 Q Okay, and for -- I guess starting with BJ Services,</p> <p>25 what was the time period that you worked with</p>
<p style="text-align: right;">15</p> <p>1 them -- and it doesn't have to be really specific,</p> <p>2 just generally?</p> <p>3 A I don't remember the exact days, but it was 2002,</p> <p>4 2003, maybe. I worked for BJ before I went to</p> <p>5 Iraq. While I was working for them, I got</p> <p>6 activated to go active duty, so technically, I</p> <p>7 worked for them five or six years, but most of that</p> <p>8 was gone in the military where they had to hold my</p> <p>9 position.</p> <p>10 Q And what was your job title, position with BJ</p> <p>11 Services?</p> <p>12 A I had multiple. I started out on a frac boat as a</p> <p>13 pump operator. I worked in coil tubing for them.</p> <p>14 I worked as a tong operator, then I got promoted to</p> <p>15 a torque-turn operator and eventually I was a</p> <p>16 senior service supervisor.</p> <p>17 Q Okay, and, I guess, just for the period of time</p> <p>18 when you were an equipment operator on a -- you</p> <p>19 said a frac boat?</p> <p>20 A Uh-huh (yes).</p> <p>21 Q Okay, what was kind of the nature of your work;</p> <p>22 what were you doing?</p> <p>23 A At that point it was an entry-level position.</p> <p>24 Basically, running all the equipment on the frac</p> <p>25 boat, cleaning, maintenance.</p>	<p style="text-align: right;">16</p> <p>1 Q And then when you said -- what was involved with</p> <p>2 the coil tubing work that you did?</p> <p>3 A So coil tubing, I was an equipment operator.</p> <p>4 Basically, manually rigging up all the equipment,</p> <p>5 running the equipment, tearing down the equipment.</p> <p>6 Q And then you also did -- was it tong --</p> <p>7 A Tong. I was a tong operator, which is running the</p> <p>8 piece of equipment that screws pipe together, in</p> <p>9 layman's terms.</p> <p>10 Q And then what kind of work were you doing as the</p> <p>11 senior service supervisor?</p> <p>12 A Basically, the same -- all the same things, just --</p> <p>13 once you learn how to run everything, you become a</p> <p>14 supervisor and you have a few people that work with</p> <p>15 you or below you.</p> <p>16 Q Okay, and when you said you worked for BJ Services</p> <p>17 from 2002-2003, is that the active time period that</p> <p>18 you worked with them, if you can remember?</p> <p>19 A I worked at BJ Services on frac boats. That was</p> <p>20 only four or five months. They sold the frac boat,</p> <p>21 so they transferred me to coil tubing. I did that</p> <p>22 about a year, then I got activated to go to Iraq.</p> <p>23 When I came back, they had -- BJ purchased another</p> <p>24 company called Cajun Tubular and I had former</p> <p>25 experience doing that, so I transferred to that</p>

<p style="text-align: right;">17</p> <p>1 division and I worked there another three or four 2 years -- two years, maybe more. 3 Q And -- sorry, go ahead? 4 A That was it. And then I left. 5 Q Okay, and I guess, what was the time when you left, 6 just approximately? 7 A Maybe 2007 or '08. 8 Q Okay, and who did you go to work for post-BJ 9 Services; was that Baker Hughes? 10 A Baker Hughes. 11 Q And, just again, kind of roughly speaking, what 12 time period did you start with Baker Hughes? 13 A Maybe around 2008ish -- I mean, directly after. I 14 left one job to go straight to another. 15 Q Sure. And what was the nature of your -- what kind 16 of work did you do with Baker Hughes? 17 A So at Baker Hughes is when I started running 18 reamers. I was a reamer hand. 19 Q And then just, generally speaking, what is involved 20 with being a reamer hand when you were working with 21 Baker Hughes? 22 A Everything from working in the shop, building 23 tools, assembling them, inspecting tools, tearing 24 the used ones down, clean them up to rebuild them, 25 to go in two locations and operated those tools.</p>	<p style="text-align: right;">18</p> <p>1 Q And where -- I guess where, physically, did you 2 work out of with -- when you worked at Baker 3 Hughes? 4 A My office was in Broussard, Louisiana, so I was 5 either working there or at any remote location. It 6 could've been anywheres -- anywheres in the world. 7 I've worked multiple countries, multiple locations, 8 deep water, land, everywhere. 9 Q So kind of wherever Baker Hughes sent you, that's 10 where you went? 11 A Correct. 12 Q And, roughly, around what time period did you stop 13 working for Baker Hughes? 14 A The day that Schlumberger or Smith offered me a 15 job. I don't remember if it was 2011 or '12. 16 Q Okay, and -- 17 A And I might be wrong on those dates. 18 Q Oh, yeah. No, I understand it's been a long time, 19 so we're not holding you necessarily to that. 20 Okay, and that was that time you said you were 21 worked for Smith/Schlumberger? 22 A Correct. 23 Q Okay, and -- 24 A It may have been '14, but I don't remember. I 25 stopped working in '17 -- I worked there, like,</p>
<p style="text-align: right;">19</p> <p>1 three years. 2 Q And I know you have another lawsuit pending against 3 Smith, correct? 4 A That is correct. 5 Q And that involves -- you've got claims for -- in 6 connection with your disability benefits and then 7 some claims regarding disability discrimination, 8 correct? 9 A That is correct. 10 Q Okay, and other than that lawsuit, are you -- have 11 you ever been involved in any other lawsuits? 12 A No. 13 Q Have you ever filed -- 14 A I take that back. Yes, I have. 15 Q Okay -- 16 A But it was -- I got a postcard from Baker Hughes 17 opting me into an overtime lawsuit, but I -- I 18 wasn't a plaintiff. It wasn't a case. It was just 19 an opt-in and then two years later, a check arrived 20 at my door. I never talked to no one and never 21 seen an attorney. It never was disposed. I didn't 22 even know what was going on, to be honest. 23 Q Okay, do you recall approximately the time period 24 that was that you got that notice? 25 A I don't remember when I got it because I honestly</p>	<p style="text-align: right;">20</p> <p>1 don't ever remember opting in. It might've been 2 something automatic, but I don't know. By the time 3 I got the check, I was multiple years into 4 Schlumberger and Smith. I honestly don't even 5 remember opting in. I want to say it was every 6 single employee cause every single person I know 7 that worked for Baker was opted in. 8 Q Do you happen to remember if it was a lawsuit or 9 was it an investigation by the Department of Labor, 10 any details that you recall? 11 A I honestly don't know. I just know that -- no, I 12 don't know what it was. I just know it was being 13 represented by Nations Law Firm somewhere in a 14 different state and they contacted me and that's 15 it. 16 Q And, other than -- I guess, other than this case 17 and your other case against Smith, have you ever 18 been a witness in any other civil lawsuit? 19 A Never. 20 Q And have you ever filed for bankruptcy? 21 A Never. 22 Q And other than something other than like minor 23 traffic stops, have you ever been convicted of a 24 crime? 25 A I had -- I was arrested for something that was</p>

<p style="text-align: right;">21</p> <p>1 all -- everything was dismissed.</p> <p>2 Q So after your work, you were arrested and the DA</p> <p>3 didn't prosecute you for anything and dismissed all</p> <p>4 the charges?</p> <p>5 A Everything was put on a Code 893 and I was pardoned</p> <p>6 of everything.</p> <p>7 Q Okay, while you haven't been convicted, have you</p> <p>8 ever been -- have you ever pled no contest in any</p> <p>9 criminal charges?</p> <p>10 A Not that I'm aware of. My attorneys handled</p> <p>11 everything.</p> <p>12 Q Sure. I guess, other than the one time that you</p> <p>13 had been charged, have you ever been arrested any</p> <p>14 other time?</p> <p>15 A Oh, no. No. Never.</p> <p>16 Q Okay, and then for our lawsuit that we're here for</p> <p>17 today, what is your understanding of the claims</p> <p>18 that are being asserted in this lawsuit?</p> <p>19 A The understanding that I have is that Schlumberger</p> <p>20 wasn't properly paying me the correct amount.</p> <p>21 Q Okay, and as part of that, you're seeking -- is it</p> <p>22 true -- correct that you're looking to receive</p> <p>23 overtime compensation that you believed you were</p> <p>24 owed?</p> <p>25 A That's correct.</p>	<p style="text-align: right;">22</p> <p>1 Q Okay, and other than seeking overtime compensation,</p> <p>2 are there any other claims that you're asserting in</p> <p>3 this lawsuit?</p> <p>4 A I have not talked to my attorney about that, so I'm</p> <p>5 not aware.</p> <p>6 Q Do you know what statutes are being alleged that</p> <p>7 were violated?</p> <p>8 A I do not.</p> <p>9 Q And are you aware of any documents that would</p> <p>10 support your claim that you should've been paid</p> <p>11 overtime compensation?</p> <p>12 A The only documents that I have is my work schedule</p> <p>13 of where I was and how long I worked.</p> <p>14 Q And are you aware of any other individuals who</p> <p>15 might have information that would support your</p> <p>16 claim for unpaid overtime?</p> <p>17 A Other than the other people that had the same</p> <p>18 position of me. That's really the only people I</p> <p>19 would know.</p> <p>20 Q And then, I guess, if you would, who do you</p> <p>21 remember working with and having the same position</p> <p>22 for you as you -- let's just say from 2014 through</p> <p>23 the end of your employment?</p> <p>24 A I mean, I remember the names of numerous coworkers,</p> <p>25 William Aguirre, Colt Johnson, Jeremy Sonnier, Ryan</p>
<p style="text-align: right;">23</p> <p>1 Thompson -- there were 30 of us. I don't remember</p> <p>2 all their names, but there's a bunch of us.</p> <p>3 Q Sure. And those are all folks that were reamer</p> <p>4 hands?</p> <p>5 A They were the reamer hands assigned to my area. I</p> <p>6 mean, I'm sure there were more elsewhere. That's</p> <p>7 just the ones that fell under the same, I guess,</p> <p>8 office as me.</p> <p>9 Q Sure. And what information would these individuals</p> <p>10 have to -- that would support the claim for unpaid</p> <p>11 overtime compensation, if you know?</p> <p>12 A Other than them just doing this same job as me, so</p> <p>13 they would be able to collaborate the type of work</p> <p>14 I did, the number of hours I worked and the areas</p> <p>15 we worked. Other than that, I don't -- I don't</p> <p>16 know of any other support there would give.</p> <p>17 Q Sure. During the time that you worked for Smith as</p> <p>18 a reamer hand, did you ever complain to your</p> <p>19 managers about compensation issues?</p> <p>20 A About the amount that we got paid?</p> <p>21 Q Anything, the amount or whether -- if you ever</p> <p>22 complained and you thought you were -- that you</p> <p>23 thought you were entitled to overtime, a mistake on</p> <p>24 your pay statement, any kind of complaint involving</p> <p>25 your compensation?</p>	<p style="text-align: right;">24</p> <p>1 A Well, there was always talk about getting paid</p> <p>2 more.</p> <p>3 Q Can't blame you on that one.</p> <p>4 A Yeah, I mean, that's just common in the industry, I</p> <p>5 guess.</p> <p>6 Q And did you ever complain to your managers that you</p> <p>7 felt you should've been being paid overtime?</p> <p>8 A I don't recall that exact conversation or anything.</p> <p>9 Q And the lawsuit we're here for, that was filed in</p> <p>10 February of 2016; is that correct?</p> <p>11 A I don't remember when I filed. It was -- you can</p> <p>12 see I'm off on my dates cause I thought I worked</p> <p>13 til '17, so this was after, so apparently, it was</p> <p>14 before that.</p> <p>15 Q Sure. So, Mr. Venable, I'm gonna hand you a</p> <p>16 document we're gonna mark as Exhibit 1.</p> <p>17 (REPORTER'S NOTE:</p> <p>18 Whereupon a document was marked for</p> <p>19 identification as "Exhibit 1," and same is</p> <p>20 attached hereto at the end of the deposition.)</p> <p>21 BY MR. BOWDLER:</p> <p>22 Q Take a minute to look at that.</p> <p>23 A (Reviewing document.)</p> <p>24 Q And this is a copy of the complaint that was filed</p> <p>25 in this case; is that correct?</p>

6 (Pages 21 to 24)

<p style="text-align: right;">25</p> <p>1 A That's what it appears to be.</p> <p>2 Q And have you seen this document before today?</p> <p>3 A I don't recall the exact document. I'm not saying</p> <p>4 that my attorney didn't email it to me or something</p> <p>5 three years ago, but.</p> <p>6 Q Sure.</p> <p>7 A Well, I signed it, so I guess I've seen it.</p> <p>8 Q Sure. And you approved the filing of this lawsuit</p> <p>9 on your behalf, correct?</p> <p>10 A I did.</p> <p>11 Q And you understand that the case was filed a</p> <p>12 collective action?</p> <p>13 A I believe so, yes.</p> <p>14 Q Okay, what's your understanding of what it means</p> <p>15 for the case to have been filed as a collective</p> <p>16 action?</p> <p>17 A To my knowledge, it's similar to the one that Baker</p> <p>18 where just a bunch of people get together and</p> <p>19 disagree or have the same thing and then it gets</p> <p>20 processed at once.</p> <p>21 Q Okay, did you authorize this suit to be filed as a</p> <p>22 collective action?</p> <p>23 A Yes.</p> <p>24 Q If you would, take a look at paragraph number one</p> <p>25 of the complaint?</p>	<p style="text-align: right;">26</p> <p>1 A (Complying.) Okay.</p> <p>2 Q And that states that you were bringing a claim to</p> <p>3 recover unpaid overtime pursuant to the Fair Labor</p> <p>4 Standards Act; is that correct?</p> <p>5 A That is correct.</p> <p>6 Q When did you first become aware that there may have</p> <p>7 been issues related to the payment of overtime for</p> <p>8 reamer hands like yourself employed by Smith?</p> <p>9 A When did I notice that something was incorrect?</p> <p>10 Q Yeah, when did you first become aware the fact that</p> <p>11 maybe something was wrong and we should've been</p> <p>12 paid overtime?</p> <p>13 A I don't remember the exact date, but whenever</p> <p>14 numerous other companies were having similar</p> <p>15 lawsuits, that's when I realized that I should've</p> <p>16 been getting something.</p> <p>17 Q And the other lawsuits, were those lawsuits</p> <p>18 involving reamer hands as well or was it just kind</p> <p>19 of general that there were a bunch of overtime</p> <p>20 lawsuits you became aware of?</p> <p>21 A They were general across the oil field, and most of</p> <p>22 it was hearsay and I didn't really understand</p> <p>23 everything until I spoke to an attorney.</p> <p>24 Q And, again, just -- it doesn't need to be exactly</p> <p>25 specific here, but approximately, when did you</p>
<p style="text-align: right;">27</p> <p>1 decide you wanted to file a lawsuit for unpaid</p> <p>2 overtime against Smith?</p> <p>3 A I don't exactly remember the date when I decided to</p> <p>4 file. It was a long process that -- it wasn't just</p> <p>5 like a one-day decision. I was actually contacted</p> <p>6 by a couple attorneys asking if I wanted to, and</p> <p>7 then it took me months to find an attorney cause</p> <p>8 all the attorneys that contact you, the -- they</p> <p>9 seemed to be just doing it for them and not for me,</p> <p>10 so I chose not to do it until I found St. Pe' who</p> <p>11 decided to take the case with, you know, a more</p> <p>12 reasonable percentage, I guess. That's what made</p> <p>13 my decision cause, I mean, some people wanted</p> <p>14 almost 50 percent, then if it went to trial they</p> <p>15 wanted additional payments and all kind of stuff,</p> <p>16 so I thought they were trying to take advantage of</p> <p>17 me. So it took a long time to make a decision.</p> <p>18 Q Do you recall what attorneys it were that contacted</p> <p>19 you prior to you hiring Mr. St. Pe'?</p> <p>20 A I don't remember the name. I do know one of the</p> <p>21 attorneys was the same attorney that was involved</p> <p>22 in the Baker Hughes overtime lawsuit. They reached</p> <p>23 out because they said I had the same -- I was</p> <p>24 getting paid the same -- like both companies, so</p> <p>25 they sent me over their contract and stuff to sign</p>	<p style="text-align: right;">28</p> <p>1 and after I read it, it was so one-sided, I started</p> <p>2 looking for other attorneys, but attorneys that do</p> <p>3 this are not very easy to find cause it's not</p> <p>4 personal injury.</p> <p>5 Q Did you see any kind of advertising about filing</p> <p>6 lawsuits like filing an overtime lawsuit?</p> <p>7 A On TV?</p> <p>8 Q Yeah, or billboards or anything like that?</p> <p>9 A Yes, one.</p> <p>10 Q Did that influence your decision at all?</p> <p>11 A No, it helped me find an attorney. And it wasn't</p> <p>12 really related to overtime, but no attorneys I</p> <p>13 found were local, and then I seen his commercial,</p> <p>14 but I don't think it was for overtime, that made me</p> <p>15 find me an attorney, but it didn't sway the</p> <p>16 decision that I was looking for.</p> <p>17 Q Other than attorneys, were you approached by</p> <p>18 anybody about potentially filing an overtime</p> <p>19 lawsuit against Smith?</p> <p>20 A No.</p> <p>21 Q When you decided to file -- that you were gonna</p> <p>22 file your lawsuit, did you approach anybody, other</p> <p>23 non-attorneys, like any other former coworkers</p> <p>24 about joining you in your lawsuit?</p> <p>25 A Initially, no. Once I decided to, I spoke to other</p>

<p style="text-align: right;">29</p> <p>1 people to see how they were feeling, that's about 2 it. 3 Q And what were the responses you received from the 4 individuals you spoke with? 5 A Well, some of them were interested in what was 6 going on. Some of them -- a lot of them were 7 interested. A lot of them didn't want to 8 participate because they were scared of getting 9 blacklisted affecting their career. 10 Q And prior to filing your lawsuit, did you do any 11 kind of investigation into the law that's at issue 12 in the case? 13 A No. 14 Q And did you do any kind of research into the 15 other -- any other lawsuits involve reamer hands or 16 Smith or Schlumberger? 17 A No. 18 Q If you would, go back to Exhibit 1, and if you look 19 at -- on the first page, there's actually two 20 paragraphs that are numbered Paragraph 2, if you 21 would, take a second and read the second number 22 two. It starts with, "Plaintiffs and coworkers." 23 A (Complying.) Okay. 24 Q And just, what facts are you aware of that support 25 the allegations in that Paragraph 2?</p>	<p style="text-align: right;">30</p> <p>1 A Are you talking about the second number 2? 2 Q The second number 2, yeah. It says: 3 (Reading) Plaintiffs and coworkers were 4 employed by Defendant as reamer hands. 5 A (Reading) Performing technical and manual labor job 6 duties for flowback and pressure control jobs. 7 So, I mean, everything is correct in there. I 8 wouldn't exactly describe my job being part of -- I 9 mean, it can be, but part of flowback and pressure 10 control. It was more in the drilling process, but 11 it's not completely incorrect either. 12 Q And, I guess, what facts are you aware of to 13 support that -- to support that you were doing, I 14 guess, technical and manual labor job duties? 15 A What facts that I was performing technical and 16 manual? 17 Q Yeah? 18 A Well, sometimes I had to do calculations on a 19 computer and sometimes I had to swing a hammer, so 20 one's technical, one's manual. I really didn't -- 21 does that make sense? 22 Q No, I understand -- 23 A That's -- I'm not trying to be smart, in a way I 24 just -- 25 Q I understand. I didn't take it that way, but yeah,</p>
<p style="text-align: right;">31</p> <p>1 things like that, like what aspect of your job 2 involved, you know, manual labor job duties and 3 what aspects involved, you know, performing 4 technical job duties? 5 A So, I mean, there's lots of examples. I mean, 6 there's lots of technical as far as, you know, 7 calculations, gathering information and making 8 decisions based off of that information and then 9 there's lots of physical. The tools were very 10 heavy, I mean, everything's very heavy. So it took 11 a lot of manual labor to set up those tools, to do 12 maintenance on those tools, very long hours. 13 Sometimes that's considered -- to me, that's manual 14 when you got to stay up 30 hours in a row. 15 Q And then, if you would, turn the page? 16 A (Complying.) 17 Q And then, if you would, take a look at paragraph 18 5 -- I'm sorry, at page 5, and it's the paragraph 19 number 31? 20 A (Complying.) Okay. 21 Q Okay, and then just kind of -- same question: What 22 facts are you aware of that would support the 23 allegations in paragraph 31? 24 A (Reviewing document.) So most of the time we were 25 working, we were working very long hours and</p>	<p style="text-align: right;">32</p> <p>1 there's a difference between knowing you're 2 supposed to be getting something and you wasn't. 3 And so part of the time I was working in this 4 industry, you know, I wasn't aware that I was 5 supposed to be getting overtime and it's not 6 something you bring up because it's one of those 7 jobs where this is what we pay you, if you don't 8 like it, go somewhere else. 9 Q And, I guess, how did you learn that you were 10 supposed to be paid overtime? 11 A Just through hearsay of other people talking and 12 then, you know, people started getting in lawsuits 13 and then, you know, people contacting you, so you 14 know, you're supposed to be getting this. 15 Q Okay, and I apologize cause I might've asked you 16 this earlier, but if not, I just -- you have 17 another lawsuit against Smith currently, correct? 18 A I currently am in a lawsuit with Smith for a 19 different reason, yes. 20 Q Right, and that's the lawsuit in connection with 21 your disability benefits -- 22 A That's correct. 23 Q -- and in connection with your termination, 24 correct? 25 A That's correct.</p>

<p style="text-align: right;">33</p> <p>1 Q I'm sorry, I didn't think I asked you that before.</p> <p>2 A That's okay.</p> <p>3 Q Okay, and you started your employment with Smith</p> <p>4 around -- do you recall when it was that you</p> <p>5 started; was it around 2012 -- July 2012?</p> <p>6 A Somewhere around there.</p> <p>7 MR. BOWDLER:</p> <p>8 I'm gonna hand you a document we're gonna</p> <p>9 mark as Exhibit 2.</p> <p>10 (REPORTER'S NOTE:</p> <p>11 Whereupon a document was marked for</p> <p>12 identification as "Exhibit 2," and same is</p> <p>13 attached hereto at the end of the deposition.)</p> <p>14 MR. ST. PE':</p> <p>15 Are we gonna keep documents in order to</p> <p>16 like through all these depositions; do you</p> <p>17 want to do it that way?</p> <p>18 MR. BOWDLER:</p> <p>19 We can or we can start with "1" each time</p> <p>20 or whatever your preference is. I'm fine</p> <p>21 either way.</p> <p>22 MR. ST. PE':</p> <p>23 I prefer to keep them sequential.</p> <p>24 MR. BOWDLER:</p> <p>25 Okay, yeah, that's fine by me.</p>	<p style="text-align: right;">34</p> <p>1 BY MR. BOWDLER:</p> <p>2 Q And then, if you would, just look at the second</p> <p>3 page and then about the middle of the page, it says</p> <p>4 you were referred to Smith through Mr. Aguirre?</p> <p>5 A That's correct.</p> <p>6 Q Okay, and I guess, you talked about -- you're</p> <p>7 friends with Mr. Aguirre, you were friends with him</p> <p>8 pre your employment with Smith?</p> <p>9 A So me and Mr. Aguirre met at Baker Hughes. We were</p> <p>10 both reamer hands at that company and numerous</p> <p>11 people chose to leave Baker to go to Smith.</p> <p>12 Q And when you initially -- when this lawsuit was</p> <p>13 initially filed, Mr. Aguirre was a co-plaintiff</p> <p>14 with you, correct?</p> <p>15 A Initially, yes.</p> <p>16 Q And how long did you know Mr. Aguirre -- have you</p> <p>17 known Mr. Aguirre?</p> <p>18 A So I met Mr. Aguirre the day I started at Baker</p> <p>19 Hughes, whichever day that was. Before that, I</p> <p>20 never knew him before. We were just coworkers.</p> <p>21 Q Did you -- prior to applying with Smith, did you</p> <p>22 discuss what it was like working with Smith --</p> <p>23 working at Smith with Mr. Aguirre?</p> <p>24 A No. I mean, everyone knows, you know, there's</p> <p>25 not -- it's a very small industry, so everybody</p>
<p style="text-align: right;">35</p> <p>1 knows what it's like working for other companies</p> <p>2 cause you work with those people all the time on</p> <p>3 and off. I didn't need to get input from Will</p> <p>4 because I already knew.</p> <p>5 Q Okay. And when you applied, you applied</p> <p>6 specifically to be a reamer hand; is that correct?</p> <p>7 A That's correct.</p> <p>8 Q And when you applied, was it just kind of a cold</p> <p>9 application or were you responding to an ad or it</p> <p>10 was just kind of knowing the industry that Smith</p> <p>11 was hiring?</p> <p>12 A I guess at that point in time it was a little</p> <p>13 different where I just wanted to work for Smith, so</p> <p>14 I just walked in the door and I said my name's Jack</p> <p>15 Venable, and they already knew of me, so they hired</p> <p>16 me on the spot -- oh, and they made me do stuff</p> <p>17 like this as a technicality, here, fill this out,</p> <p>18 go online, sign some papers and you can start</p> <p>19 immediately.</p> <p>20 Q Okay, did you have to go through any kind of</p> <p>21 interviews or anything like that?</p> <p>22 A I did, and I sat down with the vice president at</p> <p>23 the time and also went through, you know, medical</p> <p>24 evaluations, drug tests and all the normal stuff.</p> <p>25 Q Do you happen to remember who the VP was at that</p>	<p style="text-align: right;">36</p> <p>1 time?</p> <p>2 A I don't recall his name, but if someone said it, I</p> <p>3 would remember. He wasn't there very long cause</p> <p>4 Schlumberger bought out Smith and -- they liked to</p> <p>5 change stuff.</p> <p>6 MR. BOWDLER:</p> <p>7 I'm gonna hand you a document we're gonna</p> <p>8 mark as Exhibit 3.</p> <p>9 (REPORTER'S NOTE:</p> <p>10 Whereupon a document was marked for</p> <p>11 identification as "Exhibit 3," and same is</p> <p>12 attached hereto at the end of the deposition.)</p> <p>13 BY MR. BOWDLER:</p> <p>14 Q Okay, and, Mr. Venable, this is an offer letter</p> <p>15 offering you employment with Smith as a SERVCO</p> <p>16 field specialist, correct?</p> <p>17 A (Reviewing document.) That is correct.</p> <p>18 Q And you accepted the offer of employment, correct?</p> <p>19 A I did.</p> <p>20 Q And at the time you were -- you would be working</p> <p>21 with SERVCO, which was a business unit of Smith</p> <p>22 Services; is that correct?</p> <p>23 A It was a very brief name change that they failed</p> <p>24 miserably, so they changed it again, yes.</p> <p>25 Q And where it says, "grade," you started at what it</p>

<p style="text-align: right;">37</p> <p>1 says a G10 grade?</p> <p>2 A That's correct.</p> <p>3 Q And at that time when you started your monthly</p> <p>4 salary was \$4,725 per month, correct?</p> <p>5 A That was my base, yes.</p> <p>6 MR. BOWDLER:</p> <p>7 I'm gonna hand you what we're gonna mark</p> <p>8 as Exhibit 4.</p> <p>9 (REPORTER'S NOTE:</p> <p>10 Whereupon a document was marked for</p> <p>11 identification as "Exhibit 4," and same is</p> <p>12 attached hereto at the end of the deposition.)</p> <p>13 BY MR. BOWDLER:</p> <p>14 Q Have you seen this before today, Mr. Venable?</p> <p>15 A (Reviewing document.) I believe so, yes.</p> <p>16 Q Okay, and this is a copy of what's called your</p> <p>17 employee mini file, which is a personnel file</p> <p>18 document that Smith keeps, and I just kind of</p> <p>19 wanted to walk through your basic employment</p> <p>20 information at the bottom. And then, according to</p> <p>21 this document, your title was -- you were a SERVCO</p> <p>22 field specialist from July 2012 through about</p> <p>23 February of 2014; is that correct -- if you have</p> <p>24 trouble reading it, let me know --</p> <p>25 A No, I can read it. I mean, I basically had the</p>	<p style="text-align: right;">38</p> <p>1 same position the whole time. They changed the</p> <p>2 name of the position many, many times. They</p> <p>3 changed their grades multiple times, so yes, I had</p> <p>4 the same position all the time. I don't really</p> <p>5 know what they mean by -- I mean, it says DT&R</p> <p>6 field specialist, but I was called many things:</p> <p>7 Senior service supervisor, field specialist, reamer</p> <p>8 hand. The company was Smith Services, which got</p> <p>9 bought out by Schlumberger and then Schlumberger</p> <p>10 didn't know what to do with it, so they kept</p> <p>11 changing -- you know, we're gonna call you SERVCO,</p> <p>12 but then they realized, well, no one knows what</p> <p>13 SERVCO is, so we're gonna change you back to Smith</p> <p>14 and then Smith -- Schlumberger Company and then</p> <p>15 eventually Schlumberger. So every time there was</p> <p>16 one of those changes, there's a change in a label</p> <p>17 somewhere, but it doesn't change the job or the --</p> <p>18 what I did.</p> <p>19 Q Okay, so from the start of your employment in July</p> <p>20 of 2012 til it came to an end, you basically -- you</p> <p>21 performed the same job function, despite what your</p> <p>22 job title was?</p> <p>23 A Correct.</p> <p>24 Q Okay, and then, at least according to this, from</p> <p>25 about August 2013 until February 2014, it lists</p>
<p style="text-align: right;">39</p> <p>1 your base salary as \$58,450; is that correct?</p> <p>2 A It was 58,450 and ended at just over 60.</p> <p>3 Q Right. Right, and for that period of time, the</p> <p>4 August 2013 to February 2014, does that -- is that</p> <p>5 about what you recall your salary being?</p> <p>6 A Sure, I remember getting started at 56,7 and</p> <p>7 getting two raises to just over 60. I do remember</p> <p>8 that.</p> <p>9 Q Okay, and again, even with the changes in salary,</p> <p>10 your job duties remained the same the whole time?</p> <p>11 A Correct.</p> <p>12 Q And your employment with Smith came to an end in</p> <p>13 2015, correct?</p> <p>14 A I believe so, yes.</p> <p>15 Q And that was -- you were laid off at that time,</p> <p>16 correct?</p> <p>17 A I was terminated.</p> <p>18 Q You were terminated, okay. And at the time you</p> <p>19 were terminated, you were offered a severance</p> <p>20 package; is that correct?</p> <p>21 A I was offered some money to sign a bunch of waivers</p> <p>22 that didn't make no sense to me. They can call it</p> <p>23 whatever they want.</p> <p>24 MR. BOWDLER:</p> <p>25 I'm just gonna hand you a document we'll</p>	<p style="text-align: right;">40</p> <p>1 mark as Exhibit 5.</p> <p>2 (REPORTER'S NOTE:</p> <p>3 Whereupon a document was marked for</p> <p>4 identification as "Exhibit 5," and same is</p> <p>5 attached hereto at the end of the deposition.)</p> <p>6 BY MR. BOWDLER:</p> <p>7 Q And this is a letter where you acknowledge</p> <p>8 receiving a waiver and release agreement; is that</p> <p>9 correct?</p> <p>10 A That's correct. I did receive it. I asked for</p> <p>11 four or five extensions so I could have time for an</p> <p>12 attorney to approve it, and that was denied.</p> <p>13 Q Okay, and as you said, you were part of the</p> <p>14 severance package or amount that you were offered</p> <p>15 and your termination was conditioned on you signing</p> <p>16 the waiver and release agreement?</p> <p>17 A Correct. I mean, I honestly don't even remember</p> <p>18 how much money they offered me. It was a</p> <p>19 substantial amount of money, but it was all</p> <p>20 contingent to me signing a bunch of releases and I</p> <p>21 did not have enough time for an attorney to look at</p> <p>22 it, so it expired.</p> <p>23 Q During the time you worked for Smith, who were your</p> <p>24 direct supervisors?</p> <p>25 A Shawn Reeves and David Voisin. They were both</p>

<p style="text-align: right;">41</p> <p>1 basically the same position, depending on what tool 2 you ran. So if I was running a whipstock tool, I 3 reported to Shawn Reeves. A reamer would go under 4 David Voisin. 5 Q And with Mr. Reeves, did you interact with Mr. 6 Reeves a lot? 7 A I mean, here and there we had slight conversations, 8 but not a lot. 9 Q And I guess when you would -- when you would have 10 interactions with Mr. Reeves, how would those be; 11 in person, telephone, email? 12 A All of the above, and it most of it was, this is 13 the job you need to do, this is where we need you 14 to go. Basically, that's it. 15 Q So, I guess, most of your interaction with him was 16 he would be assigning you to a job and giving you 17 the details of it? 18 A Correct. He coordinated all the jobs, set 19 everything up and did all the planning. 20 Q When you would be -- when you were running a job 21 for Mr. Reeves, how much interaction would you have 22 with Mr. Reeves when you were at the job site? 23 A It'd all depend on what kind of job it was, what 24 kind of problems you were having, so anytime we had 25 any irregulars, I had to call him. And I also sent</p>	<p style="text-align: right;">42</p> <p>1 him daily reports, sometimes twice a day, on what 2 was going on and he would get those reports and 3 then change the plans if necessary. Or, like I 4 said, if there was a problem, something wasn't 5 going right, I'd call him and say, hey, what do I 6 do now. 7 Q And those kind of calls, you'd call Mr. Reeves and 8 say this is the problem, we've tried this, and 9 you'd kind of talk about what your options would be 10 going forward? 11 A Correct. So any -- any irregulars, no matter how 12 big or small, you were required to call in, let him 13 know what was going on and they would give you a 14 plan of correction or something to remedy that 15 situation. 16 Q And the jobs you worked with Mr. Reeves, were those 17 whipstock jobs? 18 A Both whipstocks and reamers, depending on the time. 19 So when I first started, we was completely under 20 Mr. Reeves and they basically kept two shops, one 21 in Houma, one in Broussard, and eventually, they 22 moved us to Houma, which we fell under David 23 Voisin, so they kind of -- you know, that was one 24 of the Schlumberger changes that kind of got booked 25 under reamers and whipstocks.</p>
<p style="text-align: right;">43</p> <p>1 Q And do you remember when that was, approximately, 2 when the -- you went under Mr. Voisin? 3 A It's within the first year of employment. I don't 4 remember the date. I mean, we always worked with 5 both of them, but the date that we actually like 6 formally fell under, I don't remember. 7 Q Did you work with one more than the other? 8 A In the beginning, it was more Shawn Reeves and then 9 towards the end, it was more David Voisin. 10 Q Did you get along with Mr. Reeves? 11 A I had no quarries with him, no. 12 Q And just based on your interactions with Mr. 13 Reeves, do you believe he was honest with you in 14 his interactions with you? 15 A I don't believe he intentionally lied to me, no. 16 Q Then, I guess, do you believe he unintentionally 17 lied to you? 18 A No, not that I can recall. 19 Q And then just with Mr. Voisin about how -- was your 20 level of interaction with him as similar as Mr. 21 Reeves? 22 A Very similar. 23 Q So he would give you your assignment and then if 24 there were problems during it, you would touch base 25 with him?</p>	<p style="text-align: right;">44</p> <p>1 A Correct. 2 Q Okay, and did you get along with Mr. Voisin? 3 A Sure. 4 Q I guess, same -- based on your interactions with 5 Mr. Voisin, did you think he was honest with you in 6 his interactions with you? 7 A From what I seen, yes. 8 Q And do you recall -- just with your time with 9 Smith -- who your indirect supervisors were, so if 10 there was one level above Mr. Voisin and Mr. 11 Reeves? 12 A That position changed numerous times. I don't -- I 13 don't really remember their names right offhand. 14 And there wasn't much higher. I mean, it was 15 literally them, vice president to -- from there, 16 it's like the person over the entire United States, 17 but it's different segments. Like they got this 18 guy right here that no one can say his name, he was 19 the HR person. 20 Q Okay. 21 MR. BOWDLER: 22 Do you guys mind if we take a little 23 break? 24 MR. ST. PE': 25 No, not at all.</p>

<p style="text-align: right;">45</p> <p>1 (REPORTER'S NOTE: 2 Whereupon a short break was taken, after 3 which the proceedings continued as follows:) 4 BY MR. BOWDLER: 5 Q Okay, Mr. Venable, do you know an individual by the 6 name of Brent Kemp? 7 A Brent Kemp was a reamer hand. I don't -- I don't 8 think I've ever personally worked with him, that I 9 can recall. I've heard of him. 10 Q Okay, but you never worked with him? 11 A I don't think so, no. 12 Q And did you ever have any other kind of personal 13 interactions with him, that you can recall? 14 A Not that I can recall. 15 Q How about an individual by the name of Karl 16 Drorbish? 17 A No. 18 Q How about Charles Myers? 19 A Chuck Myers, is what I think I know, if that's the 20 same person. 21 Q Uh-huh (yes). 22 A Yes, I've met him once or twice in meetings. I 23 believe I did one job with him and that's it. He 24 was also a reamer hand. 25 Q And, other than the couple of meetings and maybe</p>	<p style="text-align: right;">46</p> <p>1 doing a job with him, any other personal 2 interactions with Mr. Myers? 3 A No. 4 Q And then how about -- do you know an individual by 5 the name of Joel Story? 6 A I've also heard of Joel Story. I think we called 7 him Brent Story. 8 Q Uh-huh (yes). 9 A Same thing. He might've been in the room when we 10 had meetings. I don't believe I had a job with 11 him. I might've seen him in the shop working, too. 12 Q And we talked about how you know Mr. Aguirre, did 13 you ever work any jobs with Mr. Aguirre? 14 A I did. 15 Q About how many, if you can recall? 16 A Three or four, maybe, at Schlumberger and three or 17 four at Baker. 18 Q And you said you worked a job -- that would be you 19 and he were on the rig together as the reamer 20 hands? 21 A Yeah, there was very few jobs that required two 22 people, so I know a couple of those we considered 23 together. You know, both of us were willing to go 24 anywhere and we also ran all the newer tools that 25 no one knew how to run, so.</p>
<p style="text-align: right;">47</p> <p>1 MR. ST. PE': 2 Off the record. 3 (REPORTER'S NOTE: 4 Whereupon an off-the-record discussion 5 was held, after which the proceedings 6 continued as follows:) 7 BY MR. BOWDLER: 8 Q When you started to work for Smith, did you say you 9 worked out of the Broussard location? 10 A Correct. 11 Q But when you -- when you went out -- when you were 12 assigned a job, you would go -- you weren't working 13 in Broussard, you would've gone out to the Gulf of 14 Mexico rigs or a rig somewhere else; is that 15 correct? 16 A It depends. So sometimes a couple days before, you 17 would go to the shop to inspect your own tools, to 18 sometimes assemble your tools, make sure 19 everything's correct and then you would go to that 20 location wherever the job was held. And even when 21 I was working in Broussard, I did the same thing in 22 Houma. It depends on where the tools were, so most 23 of the reamers were built and assembled in Houma, 24 and most of the whipstocks and hole openers were 25 built and assembled in Broussard, but since I knew</p>	<p style="text-align: right;">48</p> <p>1 how to do it all, whatever tool I was running, I 2 would go to that shop, assemble the stuff and get 3 it ready and then go. 4 Q And for the rigs that you worked on when -- for 5 Smith -- were those mostly in the Gulf of Mexico? 6 A A majority of them were in the Gulf of Mexico. 7 Q And were they mostly on deep water rigs? 8 A A majority of those were on deep water, also. 9 Q And -- 10 A Well, what I mean by "deep water" is the depth of 11 water, not really how far out. I don't know what 12 you mean by that? 13 Q Yeah, just how far, like the depth of, I guess, 14 that versus a jackup rig? 15 A Yeah, so most of them were on Fluoro rigs or spars 16 or -- there's lots of them -- different ways. 17 Q Okay, and during your time with Smith, did you work 18 on any jobs outside of the Gulf of Mexico? 19 A Yes. 20 Q And where did you -- where were those jobs? 21 A So I worked a lot -- you know, I did a bunch of 22 land jobs throughout the continental United States. 23 I also worked in Alaska. I went out the country a 24 couple times. I went to Australia, and that was 25 just for one job and I went to Angola, but I don't</p>

<p style="text-align: right;">49</p> <p>1 know if Angola was Smith or Schlumberger, I don't 2 know, one of those. 3 Q And the land jobs that you worked, do you recall 4 what states those were in? 5 A I worked in California, Texas, Oklahoma, Indiana, 6 Louisiana, Alaska. I've been to Arkansas, I've 7 been to Mississippi, I've been to Florida. Now, I 8 can't say a hundred percent if I'm not confusing 9 where I went with other companies and Schlumberger, 10 but most -- most of them were with Schlumberger, 11 also, but the oil is in most of the same states, 12 so. 13 Q Right. Okay, and you said the time you did work 14 outside of United States while you worked with 15 Smith/Schlumberger? 16 A I did. 17 Q And do you happen to recall just again, 18 approximately, the time period it was that you went 19 to Australia? 20 A Australia was probably -- when did I stop working, 21 September '15, so maybe January of '15 I went to 22 Australia or end of '14. 23 Q And how about the same, do you remember an 24 approximate time period when you went to Angola? 25 A That would've been -- Angola -- that was around '12</p>	<p style="text-align: right;">50</p> <p>1 or '13 when I first started because I remember it 2 was when -- I wasn't working there long when I went 3 and I remember it was Schlumberger because they 4 didn't want to pay me my expenses because in 5 Angola, they didn't have many credit cards, so I 6 had to pay stuff in cash and they were, like, well, 7 you should've put it on your credit card, so I 8 remember it being Schlumberger, yeah. 9 Q During the time that you worked with Smith and then 10 just -- when I refer to Smith, I mean it's both 11 Smith and Schlumberger kind of stuff? 12 A Okay. 13 Q Did you have access to any other employees' 14 personnel files? 15 A No. 16 Q Did you have access to any other employees' payroll 17 records? 18 A No. 19 Q When you -- again, this time period when you were 20 working with Smith, did you have any involvement 21 with making any policy decisions on behalf of 22 Smith? 23 A No. 24 Q Did you have any discussions with management about 25 compensation for other reamer hands, other than</p>
<p style="text-align: right;">51</p> <p>1 yourself? 2 A No. 3 Q Do you have any personal knowledge about how Smith 4 formulated its compensation practices with respect 5 to reamer hands? 6 A No. 7 Q Did you have any responsibility as part -- or did 8 you have any responsibility when you worked for 9 Smith for ensuring compliance with any wage and 10 hour loss? 11 A No. 12 Q Do you have any personal knowledge about the steps 13 that Smith took to ensure compliance with any wage 14 and hour loss? 15 A No. 16 Q Okay, did you have any involvement with anyone at 17 Smith or any discussions about classifying reamer 18 hands as exempt from overtime? 19 A No. 20 Q Did you participate in any training regarding 21 compliance with any wage and hour loss? 22 A No. 23 Q Did you have any involvement with creating the job 24 description for the -- for the DT&R fields 25 specialist position?</p>	<p style="text-align: right;">52</p> <p>1 A No. 2 Q Do you have any information about that Smith was 3 subject to any government investigations involving 4 the payment of overtime for reamer hands? 5 A No. Were they? 6 Q Are you aware of any investigation where Smith was 7 told by a government agency that it was violating 8 the law with respect to overtime payment for reamer 9 hands? 10 A No. 11 Q When you worked for Smith there were -- you had two 12 parts of your compensation, correct? 13 A Yes. 14 Q For part of your overall compensation was that you 15 received a salary, correct? 16 A I received a base salary, yes. 17 Q And you were paid bi-weekly for a year's salary 18 during the course of your employment with Smith? 19 A I believe so. I don't remember if it was biweekly 20 or if the 1st and 15th. It was either biweekly or 21 bimonthly. 22 Q Right. And then other than things like taxes or 23 401K contributions, health insurance and other 24 benefits, were there any other deductions that were 25 taken out of your salary?</p>

<p style="text-align: right;">53</p> <p>1 A Deductions? Not that I can recall for -- unless it 2 was for benefits and insurances and stuff. 3 Q And when you started working for Smith you 4 understood that part of your compensation was the 5 salary, correct? 6 A So I got paid a base salary plus one-day rate per 7 day I worked, so that was my understanding. 8 Q Okay, and you received the -- your salary -- you 9 received it whatever the payment schedule was with 10 biweekly, bimonthly? 11 A Correct. 12 Q And it didn't change based on the number of hours 13 you worked in that period, correct? 14 A That's correct. 15 Q And so, for example, if there was a week where you 16 didn't do any work where you weren't on a rig at 17 all, you still received your full salary, correct? 18 A On a rig, yes, I was still receiving my full 19 salary, but during that week I couldn't drink, I 20 couldn't go nowhere and I couldn't -- I had to be 21 within so many miles of the shop because I worked 22 on call. That's why they paid me a salary, cause 23 if they did call me and I was drunk or at a bar or 24 I went to Texas to see my aunt, then I would be 25 fired because that's why they pay me a salary was</p>	<p style="text-align: right;">54</p> <p>1 to stay close in case they need me. 2 Q Okay. And, as you said, the other part of your 3 overall compensation was you received a day rate 4 bonus, correct? 5 A That's correct. 6 Q Okay, and with these, you received a certain amount 7 for each day that you were assigned to a rig, 8 correct? 9 A I received that amount for each chargeable day, 10 meaning if Schlumberger charged for me, then I get 11 that day, but if Schlumberger didn't charge for me, 12 you know, I didn't get it. So if I worked in a 13 shop for a week, I didn't get -- I didn't get that 14 day rate. 15 Q Okay, so if you were doing work, other than 16 chargeable work to the client, that was covered by 17 your salary, but you -- if you were doing 18 chargeable work for a client, you got your day 19 rate; is that correct? 20 A For the most part, yeah. I mean, there was some 21 overlap. Sometimes I would get it, just depends. 22 Q Okay, and then other than being a day that was 23 chargeable to the client, were there any other 24 requirements that had to be met in order for you to 25 get the day rate?</p>
<p style="text-align: right;">55</p> <p>1 A No. I mean, I had to my job, but -- 2 Q Right. And let's say if you were on a rig and it 3 was a chargeable day, that the rig was not drilling 4 and there was -- you weren't necessarily working, 5 you would still receive your day rate for that day; 6 is that correct? 7 A There's never a time when you're on the rig that 8 you're not working. There's times when you're not 9 specifically being productive to the drilling 10 operations, but you always have reports to do 11 during that day. You always have to know what's 12 going on and you have to be awake because you can't 13 just go in your room, be quiet. If they can't find 14 you, then they run you off. You have to be engaged 15 at all times during all aspects. 16 Q And so the day rate, was it -- if it was a 17 chargeable day, it was pretty much automatic, you 18 just -- you got it without question? 19 A Well, I mean, if I was on a rig, I always got it, 20 yes. 21 Q And, other than being on a rig, were there other 22 days where you would earn a day bonus for that day? 23 A I mean, if there were other -- I mean, no, not 24 really. 25 Q No, but if you were in training for a day, would</p>	<p style="text-align: right;">56</p> <p>1 you get a day rate for that day or standby, or? 2 A Well, it depends. If I went to the class to renew 3 my CPR, that wasn't a day, but if I went to a 4 location with another person to learn that tool, I 5 would get a day rate for that. 6 Q Okay, -- 7 A But that's not often, cause once you learn the 8 tool, you never get it again, so. 9 Q Sure. 10 MR. BOWDLER: 11 I'm gonna hand you a document that we'll 12 mark as Exhibit 6. 13 (REPORTER'S NOTE: 14 Whereupon a document was marked for 15 identification as "Exhibit 6," and same is 16 attached hereto at the end of the deposition.) 17 A (Reviewing document.) Okay. 18 BY MR. BOWDLER: 19 Q Okay, and this is a copy of one of your pay 20 statements; is that correct? 21 A It looks like y'all got the highest one possible, 22 but yes. 23 Q Okay, well, this is the -- for the pay period of 24 December 15, 2013 through December 28, 2013, 25 correct?</p>

<p style="text-align: right;">57</p> <p>1 A Yes, it's the last pay period of the year for '13, 2 yes. 3 Q Okay, do you have any reason to doubt that this is 4 your pay statement for that pay period? 5 A No. 6 Q And if you'll look kind of in the -- towards the 7 top left, there is a section where it says on the 8 top like: 9 (Reading) Gross, taxes, deductions, net pay. 10 Do you see that? 11 A Yes. 12 Q Okay, and then the second line under there, it 13 says, "curr" and then "ytd"? 14 A Correct. 15 Q And what's your understanding of what the reference 16 to "ytd" stands for? 17 A Year to date. 18 Q And then next to that year to date, it lists -- 19 there's a number of \$300,060.24, correct? 20 A Correct. 21 Q And that is your -- that was your gross 22 compensation for year to date of 2013; is that 23 correct? 24 A That is correct. 25 Q And do you have any reason to doubt that's about</p>	<p style="text-align: right;">58</p> <p>1 how much you earned in gross compensation for 2013? 2 A No, I made really decent money. 3 Q Okay, and if you look down jut under the earning 4 section where it says biweekly salary? 5 A Uh-huh (yes). 6 Q It lists -- kind of the current amount for that, it 7 lists \$2,248.08; is that correct? 8 A Correct. 9 Q And that was to the extent you can recall your 10 biweekly salary for 2013? 11 A Correct. 12 MR. BOWDLER: 13 I'm gonna hand you a document we'll mark 14 as Exhibit 7. 15 (REPORTER'S NOTE: 16 Whereupon a document was marked for 17 identification as "Exhibit 7," and same is 18 attached hereto at the end of the deposition.) 19 A (Reviewing document.) Okay. 20 BY MR. BOWDLER: 21 Q And this is your pay statement for the pay period 22 of December 14, 2014 through December 27, 2014, 23 correct? 24 A Correct. 25 Q And, again, if we kind of look at the same place,</p>
<p style="text-align: right;">59</p> <p>1 the year to date and gross, it lists total gross 2 compensation for the year of \$319,264.42, correct? 3 A That's correct. 4 Q And is that consistent with what you recall earning 5 in 2014? 6 A Sure. 7 Q Any reason to doubt that that's about you earned in 8 gross compensation in 2014? 9 A No. 10 MR. BOWDLER: 11 I'm gonna hand you this and we'll mark it 12 as Exhibit 8. 13 (REPORTER'S NOTE: 14 Whereupon a document was marked for 15 identification as "Exhibit 8," and same is 16 attached hereto at the end of the deposition.) 17 BY MR. BOWDLER: 18 Q And, Mr. Venable, this is your pay statement for 19 the pay period of September 20th, 2015 through 20 November 3rd, 2015; is that correct? 21 A That's correct. 22 Q And your -- 23 MR. ST. PE': 24 October 3rd. 25 MR. BOWDLER:</p>	<p style="text-align: right;">60</p> <p>1 October 3rd, I'm sorry. Thank you. 2 BY MR. BOWDLER: 3 Q In your employment with Smith, it came to an end in 4 September 2015; is that correct? 5 A I believe so, yes. 6 Q And, again, just kind of looking at the same spot, 7 though, with gross and year to date, it lists year 8 to date gross compensation of \$168,787.67; is that 9 correct? 10 A That's correct. 11 Q And is that consistent with what you recall earning 12 from Schlumberger from the time you worked for them 13 in 2015? 14 A Sure. 15 Q Do you have any reason to doubt that that's 16 accurate? 17 A No. 18 Q During the time that you worked for Smith, you 19 weren't required to keep track of the specific 20 number of hours you worked each day, correct? 21 A No. 22 Q That's not correct? 23 A I wasn't -- was I mandated to -- 24 Q Yeah, did you keep track of the number of hours you 25 worked each day?</p>

<p style="text-align: right;">61</p> <p>1 A I wasn't mandated to, but usually, I would.</p> <p>2 Q And how would you keep track of that?</p> <p>3 A Excel spreadsheet.</p> <p>4 Q And is that -- you did that, personally?</p> <p>5 A Just personally, yes. Just so I'd know where I was</p> <p>6 at all times.</p> <p>7 Q So you would say I worked just -- I'm making an</p> <p>8 example on, you know, Tuesday, September 30th, I</p> <p>9 worked from 1:00 a.m. to --</p> <p>10 A It wasn't that detailed. It was more of where I</p> <p>11 was, what rig I was on and what I was doing. It</p> <p>12 wasn't down by the hour, but every job report</p> <p>13 breaks down what we're doing, also.</p> <p>14 Q And those are, what, the operator resumes, I</p> <p>15 believe? Is that what they were called?</p> <p>16 A Uh-uh (no). No, it's just a job report.</p> <p>17 Q Job report, okay.</p> <p>18 A It's the thing we had to send in to David or Shawn</p> <p>19 every day saying what we did or what was going on</p> <p>20 and we had to break that down sometimes by the 30</p> <p>21 minutes of the day, unless it was something that</p> <p>22 wasn't as relevant, we'd do every couple hours.</p> <p>23 Q And did -- other than that for compensation</p> <p>24 purposes, were you ever required to track the</p> <p>25 number of hours you worked each day?</p>	<p style="text-align: right;">62</p> <p>1 A No.</p> <p>2 Q And when you worked for Smith, you didn't have a</p> <p>3 set schedule, necessarily; is that correct?</p> <p>4 A Never.</p> <p>5 Q And, for example, you could be called to a job and</p> <p>6 you would be there til it ended?</p> <p>7 A Correct.</p> <p>8 Q And then the job didn't have a set duration. It</p> <p>9 could be 10 days, it could be 30 days?</p> <p>10 A Correct.</p> <p>11 Q What's the shortest amount of time you can recall</p> <p>12 being sent to a job for?</p> <p>13 A A day.</p> <p>14 Q A day, okay. And what were -- I guess, kind of the</p> <p>15 longest job you can remember when you worked for</p> <p>16 Smith?</p> <p>17 A Over 40 days. I mean, some of the jobs we'd go on</p> <p>18 for nine months, but then, after 40 days, it's time</p> <p>19 to come home so they send another person out.</p> <p>20 Q And when you worked for Smith, though, they did</p> <p>21 require you to keep track of the day -- the number</p> <p>22 of days that you worked for compensation purposes,</p> <p>23 correct?</p> <p>24 A That's correct.</p> <p>25 Q And that was so you could track what day rate</p>
<p style="text-align: right;">63</p> <p>1 bonuses you would be entitled to?</p> <p>2 A Well, we kept a timesheet, but the timesheet was</p> <p>3 like worked or not worked.</p> <p>4 Q And so that would be like a day -- was that online?</p> <p>5 A In the beginning, I think it was a paper timesheet</p> <p>6 that we turned in and I think towards the end, they</p> <p>7 digitized it somehow. I don't really remember, but</p> <p>8 I know at one point I was doing paper timesheets</p> <p>9 that had to be sent in. And then sooner or later,</p> <p>10 we had to go online and enter them in and they</p> <p>11 would be sent to either Shawn or David.</p> <p>12 MR. BOWDLER:</p> <p>13 I'm gonna hand you this and mark it as</p> <p>14 Exhibit 9.</p> <p>15 (REPORTER'S NOTE:</p> <p>16 Whereupon a document was marked for</p> <p>17 identification as "Exhibit 9," and same is</p> <p>18 attached hereto at the end of the deposition.)</p> <p>19 BY MR. BOWDLER:</p> <p>20 Q Is this the Excel file that you told me you were</p> <p>21 talking about?</p> <p>22 A No, this is just something we've created to --</p> <p>23 amongst other workers. People have gotten the file</p> <p>24 and changed it to basically fit their needs, and</p> <p>25 this is not something that was required by work.</p>	<p style="text-align: right;">64</p> <p>1 This had nothing to do with anything at work, it</p> <p>2 was just something I kept track of for my own</p> <p>3 personal records. I mean, it's still accurate,</p> <p>4 but.</p> <p>5 Q Yeah, and this is -- I'm sorry, go ahead?</p> <p>6 A No, I'm just saying, from what I remember. I mean,</p> <p>7 it's fairly accurate.</p> <p>8 Q Sure. And then this is something you would keep</p> <p>9 contemporaneously with the jobs you went on and</p> <p>10 days that you worked, days that you didn't work?</p> <p>11 A Yes, because as you can see, I've been many, many</p> <p>12 places, so I needed this that way somebody can say</p> <p>13 six months ago, he was on this rig and this</p> <p>14 happened, and I'll be like, well, let me check, so</p> <p>15 I'd go on here and be like, oh, yes, I was. What</p> <p>16 were you doing? That's what I was doing, you know.</p> <p>17 Q And if you could just take a quick look back to the</p> <p>18 very back -- last page on it.</p> <p>19 A (Complying.)</p> <p>20 Q And this is, I guess, for lack of a better word, a</p> <p>21 calendar of the days that you worked in 2013?</p> <p>22 A I believe so, yes.</p> <p>23 Q And then just -- I'm just looking, for example, for</p> <p>24 the line for March. For March 1st through the</p> <p>25 16th, there's -- you have in there an H, and down</p>

<p style="text-align: right;">65</p> <p>1 at the bottom, I think for the key an H equals --</p> <p>2 it says that it's a day off; is that correct?</p> <p>3 A That's correct.</p> <p>4 Q So those are days when you're not on a rig; is that</p> <p>5 correct?</p> <p>6 A For the most part, that is a day that I was not on</p> <p>7 the rig -- well, that is definitely a day that I'm</p> <p>8 not on the rig, but that it's not a chargeable day,</p> <p>9 so during some of those, I may have went to</p> <p>10 training or work at the shop or do errands or, you</p> <p>11 know, do minor things for the job or prepping for</p> <p>12 the job, but yes, I was home. So the reason why it</p> <p>13 says, "H, day off" was cause the way that Excel</p> <p>14 file worked, when I put a "H," it did not give me</p> <p>15 money for that day. If you look in the calculation</p> <p>16 to the right, so that doesn't necessarily mean that</p> <p>17 I didn't do anything, but some of those days like I</p> <p>18 didn't do anything, but I don't want you to think</p> <p>19 just cause it has an "H," I didn't do nothing.</p> <p>20 Q Sure. Understand. And then for the days where</p> <p>21 there's a "O" listed, that would be -- those are</p> <p>22 days where you're on the rig and those are</p> <p>23 chargeable days that you're earning?</p> <p>24 A Correct. So if I would've put a "O," it would</p> <p>25 automatically calculate the 1150 as far as being</p>	<p style="text-align: right;">66</p> <p>1 offshore or on the rig.</p> <p>2 Q Okay, and then just, again, on -- in April, you</p> <p>3 have there some blue V's?</p> <p>4 A Yes, I believe that's vacation days.</p> <p>5 Q Those are vacation days, okay.</p> <p>6 A It's hard to see in the printout, but I think so.</p> <p>7 Q And then in June on -- where like the 18th through</p> <p>8 25th, there's a "D" listed; do you happen to recall</p> <p>9 what the "D" stands for?</p> <p>10 A At the bottom, it stands for double-dip. That</p> <p>11 means -- as you can see, I worked that entire month</p> <p>12 of June, so there was a time where I -- I'm pretty</p> <p>13 sure this is what happened, so say I was doing a</p> <p>14 job in West Texas where they had two rigs in the</p> <p>15 same site, so I worked -- I was on a rig and they</p> <p>16 needed help over there, so I just jumped back and</p> <p>17 forth, back and forth, doing double duty. And</p> <p>18 since I charged both customers, I got both rates.</p> <p>19 Q Got it. Okay, --</p> <p>20 A And I believe that was -- out of ten years, that</p> <p>21 was the only time that's ever happened.</p> <p>22 Q And for those days where you would be</p> <p>23 double-dipping, those wouldn't necessarily be --</p> <p>24 you'd be on a land job; could you have those if you</p> <p>25 were offshore?</p>
<p style="text-align: right;">67</p> <p>1 A It has happened offshore, not to me, where they fly</p> <p>2 you from rig to rig on a helicopter, but like I</p> <p>3 said, that is so rare that most people might not</p> <p>4 have ever had that happen.</p> <p>5 Q Okay, and then in July and August, there's a lot of</p> <p>6 days with a "Z"?</p> <p>7 A Z is hazard pay. That's if there was H2S, which</p> <p>8 was hydrogen sulfide gas. It's very deadly to work</p> <p>9 around, so we charge the customer so many hundreds</p> <p>10 of dollars. I got a percentage of that to work in</p> <p>11 those situations.</p> <p>12 Q Okay, so if there's a "Z," again, that's a day</p> <p>13 you're working --</p> <p>14 A Yes, that is a working day. It just means I was in</p> <p>15 a hazardous area like Angola or something like that</p> <p>16 where, you know, they got armed people in the rig.</p> <p>17 Q Right. Got it. Okay, and then last one in</p> <p>18 November. Towards the end, there's a bunch of red</p> <p>19 T's, I think for training job, it says on the key?</p> <p>20 A Right, so that was one of the few times that I went</p> <p>21 out as a second person to learn a new tool. So you</p> <p>22 see where -- see where it's "T," you do the same</p> <p>23 work but your day rate changes to much less, even</p> <p>24 though I was up to the same amount of hours, doing</p> <p>25 all the same work, your rate never depended on your</p>	<p style="text-align: right;">68</p> <p>1 hours. Your rate depended on what you charge.</p> <p>2 Q Okay, you had mentioned before that for the days</p> <p>3 where there was an "H," it might've been a day</p> <p>4 where you were taking classes or at the shop or</p> <p>5 something like that. Is there -- are you aware of</p> <p>6 anything that we could look to that would say for</p> <p>7 these days, like which days you might've been in</p> <p>8 the shop or doing -- like running errands for a</p> <p>9 job, that sort of thing?</p> <p>10 A No, I didn't keep track of that and I don't know of</p> <p>11 anybody who did. So, basically, this document was</p> <p>12 just a way that I could no where I was being</p> <p>13 charged and to keep a running tally of how much I</p> <p>14 was making and how many days, you know, I worked.</p> <p>15 Cause, I mean, like you see here, I worked 214</p> <p>16 days. That's 214 days not home. I mean, that's</p> <p>17 completely gone, which is, you know, more than half</p> <p>18 the year.</p> <p>19 Q Right.</p> <p>20 A But I didn't keep track of days. I mean, like</p> <p>21 everywhere you see a "O," a few days before that I</p> <p>22 was probably prepping for the job. Sometimes prep</p> <p>23 just means me sitting at a computer doing</p> <p>24 calculations that way when I get to the job I'm</p> <p>25 ready to go, but it's not -- it's not paid for</p>

<p style="text-align: right;">69</p> <p>1 that. That's just work that you do to be good at 2 what you do. 3 Q Okay, and if you could take a look at -- it's the 4 third page. I guess this is a listing of your 5 hitches for 2013? 6 A Uh-huh (yes). 7 Q Okay, and then for -- on the sixth row, it said you 8 had from May 13 to the 16th of 2013. You have -- 9 it's: 10 (Reading) Prep for Angola trip. 11 A Uh-huh (yes). 12 Q Okay, and then just, I'm curious for those days, 13 you know, what was the kind of stuff you were doing 14 for prepping for the Angola trip on those days? 15 A So that's four days, that was probably -- probably 16 a trip to Houston. To work in Angola you have to 17 get a very strict visa, so that was probably four 18 paid days because I was in Houston the whole time 19 doing interviews at the Angolan Consulate getting 20 my visa, doing all the paperwork, going through 21 interviews. It's not very easy to work in Angola. 22 Standby for Angola is the same thing. I was just 23 prepping for the job. I couldn't go anywhere else 24 because I was slotted for that job, so they had to 25 pay me.</p>	<p style="text-align: right;">70</p> <p>1 Q Okay, so you were waiting to get the call to go to 2 Angola and then because of that, you just -- you 3 had to kind of stay put and be ready -- 4 A Well, there was a lot of other stuff like -- so I 5 was running -- part of that was running the job 6 remotely because, you know, we sent the tools 7 over -- you know, I ran to the shop, prepped all 8 the tools myself, packed everything up myself and 9 we had to send it to Angola, then it had to go 10 through customs. Once it got through customs, the 11 Angolan department of Schlumberger got a hold of it 12 and, of course, they didn't know what it was, so I 13 had to stay in constant communication with them 14 trying to get them to know what my stuff is and 15 make sure it's ready, that way when I get there -- 16 because I only had so many days on my visa and I 17 had to try and plan, that way when I get there I 18 can just start the job and finish the job before 19 they kick me out of the country. 20 Q Okay, and for the June 19, 2013 til the June 25th, 21 the BPD? 22 A Uh-huh (yes). 23 Q So was that a -- during that short time period, did 24 you run the -- do a job while you were on standby 25 for Angola or was that part of the Angola job?</p>
<p style="text-align: right;">71</p> <p>1 A Hold on, let me check the calendar. I might've 2 told you wrong earlier. What is this June -- 6/19 3 to -- 4 Q Actually, that's when you have the D's on there. 5 A Okay, so that's what happened is I did not go from 6 rig to rig like I recalled. So those days are, I 7 was getting paid for Angola doing all that stuff 8 remotely, and then they had a job on the ADV, which 9 was an emergency. They had no one to go, so they 10 basically snuck me out there and I did that job at 11 the same -- since I was working remotely for 12 Angola, they let me do both jobs. That's what it 13 appears. 14 Q Okay, -- 15 A So that's why I got paid twice, because Angola was 16 paying me and then BP had to pay me. And what I 17 mean by "pay me," is they paid Schlumberger and 18 then Schlumberger paid me. 19 Q Right, and then it was -- it looks like you were in 20 Angola from -- on line 10 -- from July 8th to 21 August 14 of 2013? 22 A Yeah, for 38 days. And there were numerous 23 occasions where I worked 30-plus days. 24 MR. BOWDLER: 25 I'm gonna hand you a set of documents</p>	<p style="text-align: right;">72</p> <p>1 we're gonna mark as Exhibit 10. Take a look 2 through those. 3 (REPORTER'S NOTE: 4 Whereupon a document was marked for 5 identification as "Exhibit 10," and same is 6 attached hereto at the end of the deposition.) 7 A (Reviewing document.) So this is what I was 8 talking about as far as my timesheets. I guess you 9 were right, it's service operator job log. 10 BY MR. BOWDLER: 11 Q And these are, as you said, the paper timesheets 12 where you would record the days on which you 13 were -- you would get paid a day rate? 14 A Correct, so I would fill this out and send it in 15 and then once I send it in, you know, basically, 16 it's the -- I mean, they -- it looks like they -- 17 some stuff is confidential, so they blocked it out, 18 but basically, say I was on a BP rig, that would 19 say right here in custom, BP, is it deep water, 20 land, barge or shelf, you check that. You put the 21 job number, you know, where you worked and then at 22 the bottom, this stuff was filled out by them, 23 basically, saying that this is the job we charged 24 them. 25 Q Okay, and just for these, do you have any reason to</p>

<p style="text-align: right;">73</p> <p>1 doubt the accuracy of your job logs?</p> <p>2 A Doubt my job logs?</p> <p>3 Q Yeah, for these, the ones that you filled out for</p> <p>4 you?</p> <p>5 A Oh, no, there's no reason to doubt them.</p> <p>6 Q I know this is a little tedious, but --</p> <p>7 A Is this per year?</p> <p>8 Q This is -- these are gonna be your 2013 job logs,</p> <p>9 if you could take a look at those -- I'm sorry, so</p> <p>10 that should be 11.</p> <p>11 (REPORTER'S NOTE:</p> <p>12 Whereupon a document was marked for</p> <p>13 identification as "Exhibit 11," and same is</p> <p>14 attached hereto at the end of the deposition.)</p> <p>15 BY MR. BOWDLER:</p> <p>16 Q These are your job logs for 2013?</p> <p>17 A Uh-huh (yes).</p> <p>18 Q And, again, same with the other one, any reason to</p> <p>19 doubt the accuracy of these job logs in particular,</p> <p>20 the days listed that you worked -- you listed as</p> <p>21 being eligible for a day rate?</p> <p>22 A Correct.</p> <p>23 MR. BOWDLER:</p> <p>24 I'm just gonna make this as Exhibit 12.</p> <p>25 (REPORTER'S NOTE:</p>	<p style="text-align: right;">74</p> <p>1 Whereupon a document was marked for</p> <p>2 identification as "Exhibit 12," and same is</p> <p>3 attached hereto at the end of the deposition.)</p> <p>4 A This is gonna be '15?</p> <p>5 BY MR. BOWDLER:</p> <p>6 Q Yeah, this is gonna be your job log for 2015.</p> <p>7 A (Reviewing document.)</p> <p>8 Q And, again, any reason to doubt that these are</p> <p>9 accurate?</p> <p>10 A No.</p> <p>11 Q And so if there were -- if there's gaps in the days</p> <p>12 listed on your job logs, those are days where you</p> <p>13 weren't getting a day rate, correct? So, for</p> <p>14 example, I guess, we'll just look to -- at the</p> <p>15 first page, it's -- on this one it's first day</p> <p>16 September 9, 2015 and last day, September 23, 2105?</p> <p>17 A Yes, so if I were to forget to turn in one of</p> <p>18 these, I wouldn't get paid, but for the most part,</p> <p>19 when we're making \$1,000 a day, you don't forget.</p> <p>20 I would think they're correct.</p> <p>21 Q Right, well, if you flip the page back to the</p> <p>22 second page, so it lists first day 8/2/2015 to</p> <p>23 8/7/2015, correct?</p> <p>24 A That's correct.</p> <p>25 Q Okay, and then going back to the first page, the</p>
<p style="text-align: right;">75</p> <p>1 first day is 9/9/2015?</p> <p>2 A To 9/23, yes.</p> <p>3 Q Yeah, so then for 8/8/2015 until, say, 9/8, those</p> <p>4 are days where you're either off, at home or you</p> <p>5 might be doing shop work, things like that, getting</p> <p>6 ready for a job?</p> <p>7 A Correct.</p> <p>8 Q And then, I think you said, at some point you guys</p> <p>9 starting having to use an online system for</p> <p>10 reporting your day's work?</p> <p>11 A I believe so, yes. It was basically the same</p> <p>12 sheet. We'd just do it online and print it out or</p> <p>13 they would print it out.</p> <p>14 Q And that was the same thing, you would log in and</p> <p>15 record your status for the day either like on the</p> <p>16 job, vacation, off, that sort of thing?</p> <p>17 A Uh-huh (yes).</p> <p>18 Q So this is a printout of your files from that web</p> <p>19 system, just so you know.</p> <p>20 A (Reviewing document.) Guh.</p> <p>21 Q I know, it's a little hard to read and,</p> <p>22 unfortunately, if we tried to get it all on one</p> <p>23 page, then it's really impossible to read.</p> <p>24 MR. ST. PE':</p> <p>25 So that I understand, this supplements</p>	<p style="text-align: right;">76</p> <p>1 the exhibits 10, 11 and 12?</p> <p>2 MR. BOWDLER:</p> <p>3 Correct. Yeah, what this is -- and Mr.</p> <p>4 Venable can correct me if I'm wrong, but they</p> <p>5 would go online and for each day record, you</p> <p>6 know, for example, just -- if you look on the</p> <p>7 first page, time dates, vacation days,</p> <p>8 personal. We go down and the list well site,</p> <p>9 job, vessel, that sort of thing.</p> <p>10 A (Reviewing document.) Is this for every day?</p> <p>11 BY MR. BOWDLER:</p> <p>12 Q Well, I was gonna ask next, do you recall when you</p> <p>13 started having to use --</p> <p>14 A I don't.</p> <p>15 Q Okay.</p> <p>16 A And I remember in the beginning of this, it was one</p> <p>17 of those things that, hey, we're gonna start doing</p> <p>18 this, but no one really did it. We still stuck to</p> <p>19 this. So there was a transitional period where --</p> <p>20 that -- I can't say a hundred percent that it's a</p> <p>21 hundred percent accurate cause it's so long ago, I</p> <p>22 don't remember when I started taking it or when</p> <p>23 they started taking like, hey, this is where it</p> <p>24 needs to be. Cause, to be honest, a lot of the</p> <p>25 changes Schlumberger did, the people at Smith tried</p>

<p style="text-align: right;">77</p> <p>1 their darndest to fight it for as long as possible.</p> <p>2 Q And then for these, if you -- if you would flip on</p> <p>3 the third page, just kind of at the very top</p> <p>4 there's some line entries kind of on the -- about</p> <p>5 two-thirds of the way it has date --</p> <p>6 A Like here?</p> <p>7 Q Yeah, I'll show you, there's a date column --</p> <p>8 A Reported on?</p> <p>9 MR. ST. PE':</p> <p>10 He's on the second page.</p> <p>11 BY MR. BOWDLER:</p> <p>12 Q Oh, you're on the -- one more page.</p> <p>13 A Three?</p> <p>14 Q Yeah, third page. Okay, and then, just for those,</p> <p>15 there's a bunch of it, from -- it looks like April</p> <p>16 26, 2015 through May 25th -- May 6th, 2015, and</p> <p>17 then it's listed as like a day off?</p> <p>18 A Okay.</p> <p>19 Q And, again, would those be days where you're not</p> <p>20 getting a day rate and you're either -- you're at</p> <p>21 home, but you might be doing shop work or something</p> <p>22 like that?</p> <p>23 A Possibly. It appears to be -- everything seems to</p> <p>24 be broken down into a few different things, kind of</p> <p>25 like the way I do with mine, either you're getting</p>	<p style="text-align: right;">78</p> <p>1 paid a bonus, you're not getting paid a bonus, you</p> <p>2 know, other things that are documented is like if</p> <p>3 I'm taking a family day or a vacation day.</p> <p>4 Q Right. Okay.</p> <p>5 A And you can also see that some of this stuff is</p> <p>6 reported by not me. It was reported by Stasia</p> <p>7 Bergeron, which was the secretary/office manager,</p> <p>8 some of it's reported by David. I want to say when</p> <p>9 it was reported by her is probably whenever she was</p> <p>10 just reading these in here for us because they</p> <p>11 wasn't making us do this yet. I think. I don't</p> <p>12 know.</p> <p>13 Q Okay, so if we were trying to figure out which days</p> <p>14 at a minimum that you worked, would it be better to</p> <p>15 look at the service operator job logs or I guess</p> <p>16 maybe your calendar would be the best one?</p> <p>17 A I mean, I would look at all three and just</p> <p>18 correlate them and they should be pretty similar,</p> <p>19 and if one is grossly overrated or something, then</p> <p>20 we'll have to figure out what's wrong. And the one</p> <p>21 I did, like I said, I was doing it just for me, no</p> <p>22 one else, so I wouldn't lie to myself.</p> <p>23 Q Right.</p> <p>24 A So I don't -- I mean, but I'm not saying, no, this</p> <p>25 is not accurate either. It should all match. It</p>
<p style="text-align: right;">79</p> <p>1 should all be the exact same.</p> <p>2 Q Okay.</p> <p>3 THE WITNESS:</p> <p>4 I went from 12 to 14, did I miss one?</p> <p>5 COURT REPORTER:</p> <p>6 That should be 13.</p> <p>7 (REPORTER'S NOTE:</p> <p>8 Whereupon a document was marked for</p> <p>9 identification as "Exhibit 13," and same is</p> <p>10 attached hereto at the end of the deposition.)</p> <p>11 MR. BOWDLER:</p> <p>12 Do you guys mind if we take a quick</p> <p>13 break?</p> <p>14 MR. ST. PE':</p> <p>15 No.</p> <p>16 (REPORTER'S NOTE:</p> <p>17 Whereupon an off-the-record discussion</p> <p>18 was held, after which the proceedings</p> <p>19 continued as follows:)</p> <p>20 BY MR. BOWDLER:</p> <p>21 Q So, Mr. Venable, when you would go out on a rigging</p> <p>22 job, typically, were you the only reamer hand</p> <p>23 there?</p> <p>24 A Correct.</p> <p>25 Q And did you ever work any jobs where there were two</p>	<p style="text-align: right;">80</p> <p>1 reamer hands at the same time?</p> <p>2 A Very few. I could probably count on one hand how</p> <p>3 many times I went out with more than one reamer</p> <p>4 hand.</p> <p>5 Q Okay.</p> <p>6 A Were those like in a particular location, like if</p> <p>7 Alaska required you to have two, or?</p> <p>8 A No. It was mostly on a specific tool. They had a</p> <p>9 certain reamer that was new and it needed constant</p> <p>10 supervision, so we had two people on that tool, but</p> <p>11 it was just that one. In those cases, we worked 12</p> <p>12 hours on, 12 hours off.</p> <p>13 Q And do you happen to recall what tool that was?</p> <p>14 A The XC.</p> <p>15 Q And that was, I guess, the Rhino XC?</p> <p>16 A Uh-huh (yes).</p> <p>17 Q For the majority of the time when you were the only</p> <p>18 reamer on the job, if you would kind of walk</p> <p>19 through kind of what a typical day was? I know in</p> <p>20 some ways there's really no typical or average day,</p> <p>21 but?</p> <p>22 A So, typically, before the job, you would go to the</p> <p>23 shop, check all your tools, make sure everything's</p> <p>24 there. When you would get to the rig, I mean, you</p> <p>25 travel to the heliport or something and you fly</p>

<p style="text-align: right;">81</p> <p>1 out. As soon as you land, you check in with the 2 company man and let him know you're there. Then 3 you put on your safety gear and you go outside, 4 find all your equipment. Once you find it all, you 5 centralize it, make sure everything's there, not 6 broken, take inventory, then you would measure your 7 tool down to the fraction of an inch. I mean, down 8 to the tenths of an inch cause everything you do -- 9 all the tools are going to the hole are measured, 10 that way you know how far you're going down. So 11 you measure -- I mean, one tool is the size of this 12 table and there's probably 50 measurements on it. 13 Every time there's a change in anything, a 14 diameter, you got to measure it all. 15 So you measure it all, sometimes you would 16 assemble certain tools, put them together, 17 depending on the job and that's once all of your 18 stuff is ready, then you go back inside and you 19 start doing your calculations and you work hand in 20 hand with directional drillers and NWD personnel to 21 make sure your tools are compatible with their 22 tools. And then I have to sit there and go through 23 every -- you know, you have a projected BHA -- BHA 24 stands for bottom hole assembly. You have to check 25 every tool above yours because our tool is</p>	<p style="text-align: right;">82</p> <p>1 activated by a ball going through it, so if they 2 had someone else's tool that had nothing to do with 3 yours that had a smaller ID, the ball couldn't go 4 through, then you better catch that before you go 5 two miles underground. 6 So you've got to check not just your stuff, 7 you check everybody's stuff, make sure everything's 8 compatible and then you got to run more 9 calculations and ball-drop calculations and stuff 10 like that. And that takes awhile, so that takes 11 your day. And it also depends on how fast they're 12 ready to put your tool together. Cause they 13 usually try and get you out the day before, but 14 that's not always the case. Sometimes you get 15 there and you got to hurry up and do everything and 16 go straight to work. 17 So after all that's done, whenever they're 18 ready to start drilling, you go on the rig floor, 19 assemble all your tools and everything below it and 20 above it. And then, you know, you monitor it, the 21 entire trip in the hole, and this could be 6 hours, 22 it could be 12 hours while you trip in the hole. 23 And the reason you have to monitor it is cause if 24 your tool opens prematurely, you can do a lot of 25 damage.</p>
<p style="text-align: right;">83</p> <p>1 So you do that and once you get on bottom, you 2 start drilling and you have to be aware and there 3 the hole time while you're drilling, and that could 4 be 6 hours or it could be 22 days of drilling. It 5 could be -- I mean, there's not a set time. It 6 just depends how fast you're drilling and what 7 you're drilling through. You know, is it like 8 Armaggedon and compressed iron ferrite or is it 9 sand. And then, you know, you make adjustments the 10 whole time, based off of what perimeters you're 11 getting back that determines how fast you spin and 12 how much weight to put on there, how to open it and 13 close it. And that's a lot of long hours. I mean, 14 sometimes you're up 30-plus hours at a time with no 15 sleep. 16 And then once you finish, you do everything in 17 reverse. You pull it all out and disassemble it, 18 re-measure it. Then you got to grade the teeth on 19 it to send the gradings into the -- to report and 20 throughout all these days, you're also reporting by 21 the hour what you're doing. Some jobs, you send 22 the tools back to the shop to get redone, sometimes 23 you would redo them yourself. That means 24 unscrewing them, taking them to the bucket machine. 25 MR. BOWDLER:</p>	<p style="text-align: right;">84</p> <p>1 All right, I'm gonna hand you a document 2 we're gonna mark as Exhibit 14. 3 (REPORTER'S NOTE: 4 Whereupon a document was marked for 5 identification as "Exhibit 14," and same is 6 attached hereto at the end of the deposition.) 7 BY MR. BOWDLER: 8 Q And this is the job description for the DT&R field 9 specialist position; have you seen this before 10 today? 11 A Not that I know of. 12 Q And for a period of time, that was your official 13 job title; do you recall that? 14 A Correct. 15 Q Okay, if you would take a look for me, just at the 16 top of the job summary section. Just read that for 17 me and tell me, if based on your experience, you 18 would agree with the summary that's there? 19 A (Reviewing document.) I mean, it is purposely left 20 very open. I mean, it just says: 21 (Reading) All kinds of jobs. 22 And that's basically true because you do, 23 basically, everything. Yeah. 24 Q Okay, and then if you would, I think, probably the 25 easiest thing to do is in the -- do you see the</p>

<p style="text-align: right;">85</p> <p>1 essential responsibilities and duties section?</p> <p>2 A Uh-huh (yes).</p> <p>3 Q Okay, here I'll give you this -- my pen. Why don't</p> <p>4 you go through and, based on your experience, if</p> <p>5 there's any of those responsibilities and duties</p> <p>6 that you feel did not apply to you in your carrying</p> <p>7 out the job, if you would mark those for me?</p> <p>8 A (Reviewing document.) So where it says:</p> <p>9 (Reading) It initiates the district</p> <p>10 management's change procedure, --</p> <p>11 That's basically like I was saying before, if</p> <p>12 you notice anything that doesn't follow the strict</p> <p>13 plan that they put in place, you have to do this.</p> <p>14 It's called a management of change procedure. Say</p> <p>15 I go out there and I notice -- I don't know, the</p> <p>16 tool bolt has a small ID, I can't make the</p> <p>17 decision, based of myself, to make any changes. I</p> <p>18 have to go through this procedure, get everything</p> <p>19 approved by David or Shawn. I just didn't know if</p> <p>20 you knew what that meant.</p> <p>21 Q Okay.</p> <p>22 A I don't see anything out of the ordinary in there.</p> <p>23 They were trying to fancy it up, I guess.</p> <p>24 Q Okay, thank you. So I think you said there are</p> <p>25 differences that DT&R specialists, field</p>	<p style="text-align: right;">86</p> <p>1 specialists could provide?</p> <p>2 A Uh-huh (yes).</p> <p>3 Q I guess one of those is, obviously, reamer -- being</p> <p>4 a reamer hand, and is that primarily what you did?</p> <p>5 A So when I first started, when you was a field</p> <p>6 specialist, you basically run anything they're</p> <p>7 gonna tell you to run. As a field specialist, you</p> <p>8 need to be trained in as many different types of</p> <p>9 tools as you can. So when I first started, and it</p> <p>10 was mainly run by the Smith people, and we did</p> <p>11 reamers, hole openers, whipstocks, and bits and</p> <p>12 everything like that. When Schlumberger took over,</p> <p>13 they tried to individualize most of the stuff cause</p> <p>14 that's -- I guess that's how they are. So that's</p> <p>15 when they moved us -- they separated us. They kept</p> <p>16 half of us that stayed under Shawn and the other</p> <p>17 half of us went under David.</p> <p>18 The people under David, primarily focused on</p> <p>19 reamers. The people under Shawn, primarily focused</p> <p>20 on whipstocks, hole openers and other products and</p> <p>21 fishing tools, although, we were all cross-trained</p> <p>22 in both. So if David had a job and he didn't have</p> <p>23 nobody, he'd call Shawn and Shawn would be like,</p> <p>24 okay, I'm gonna send one and vice versa. So</p> <p>25 sometimes even though -- I mean, if you look in the</p>
<p style="text-align: right;">87</p> <p>1 records, sometimes my timesheets went to Shawn.</p> <p>2 Sometimes they went to David. And that'd depend on</p> <p>3 whose tool I was running. So we were assigned to</p> <p>4 Broussard -- I mean to Houma, but we could still</p> <p>5 work for anyone. When I went to Oklahoma, my</p> <p>6 timesheet went to Oklahoma. So we -- I guess we</p> <p>7 was kind of separate, even though we was housed at</p> <p>8 one, I could work for anyone.</p> <p>9 Q Okay, and just in what primarily jobs did you do?</p> <p>10 A My main -- 90 percent of the work I did was</p> <p>11 reamers, 90-plus percent.</p> <p>12 Q During your time with Smith, did you ever do any</p> <p>13 fishing jobs?</p> <p>14 A No.</p> <p>15 Q Any through tubing?</p> <p>16 A Through tubing?</p> <p>17 Q Yeah?</p> <p>18 A No.</p> <p>19 Q Did you do any whipstock jobs?</p> <p>20 A I did do whipstock jobs, yes.</p> <p>21 Q And what -- for the reaming tools, what was it, the</p> <p>22 Rhino reamer was primarily the --</p> <p>23 A Primarily, yeah. It's the most common.</p> <p>24 Q And the whipstock jobs that you ran, were those</p> <p>25 training jobs, like did you run them by yourself or</p>	<p style="text-align: right;">88</p> <p>1 did you have more than one field specialist with</p> <p>2 you?</p> <p>3 A I went on both. I -- most of them were training,</p> <p>4 but I did do one other one.</p> <p>5 Q And when you did the training jobs, did you have</p> <p>6 another DT&R specialist with you?</p> <p>7 A Correct.</p> <p>8 Q Okay, and he or she was kind of training you on how</p> <p>9 to use the tool?</p> <p>10 A Well, whenever -- so whenever I came to</p> <p>11 Schlumberger, I was aware of most of those tools</p> <p>12 already from previous companies, but your first</p> <p>13 jobs -- your first couple of jobs always are with</p> <p>14 someone else so they can make sure you know and not</p> <p>15 just good at writing resumes, so I believe with</p> <p>16 reamers, I never -- I don't think I ever officially</p> <p>17 went on a training job. Whipstocks, I went on a</p> <p>18 training job my first one, and my second one and I</p> <p>19 think I did my third one alone and then I think</p> <p>20 that's all I did. It was not very common because I</p> <p>21 was -- I could run so many reamers, it kept me</p> <p>22 busy. And then so many customers requested me, it</p> <p>23 kept me busy, so I never really had time to do</p> <p>24 other stuff.</p> <p>25 Q Did you -- when you did reamer jobs, did you have</p>

<p style="text-align: right;">89</p> <p>1 any reamer jobs where you had somebody who was</p> <p>2 training on the tool with you?</p> <p>3 A Like training under me?</p> <p>4 Q Yeah, training under you?</p> <p>5 A I don't believe so, no. Never with Smith.</p> <p>6 Q Never with Smith?</p> <p>7 A Not that I can recall.</p> <p>8 Q When you started with Smith, did you have to go</p> <p>9 through any kind of like school or training or</p> <p>10 anything like that?</p> <p>11 A I'm sure they sent me to a couple of like training</p> <p>12 classes like rigging -- like certifications like</p> <p>13 you need to update your water survival or something</p> <p>14 like that. Never a reamer class or nothing like</p> <p>15 that, no. Cause I already came -- when I got</p> <p>16 hired, they said, okay, you're gonna spend a week</p> <p>17 in the shop and go on some training jobs. I spent</p> <p>18 two days in the shop and they said we've got a job</p> <p>19 for you and you've got to go by yourself. So I</p> <p>20 never really trained. They just --</p> <p>21 Q They just kind of threw you out there and because</p> <p>22 of your past experience, you --</p> <p>23 A Because I had previous experience, yes.</p> <p>24 Q Okay. And the -- Smith's customers that you would</p> <p>25 go and provide services to, they're primarily oil</p>	<p style="text-align: right;">90</p> <p>1 and gas exploration and development companies; is</p> <p>2 that correct?</p> <p>3 A Primarily, yes, but I also did a couple odd jobs</p> <p>4 like they sent me to Indiana to drill some disposal</p> <p>5 wells for a steel manufacturing company so they</p> <p>6 can -- all their byproduct, they can pump it in the</p> <p>7 ground, basically.</p> <p>8 Q And, for the most part, other than when you were on</p> <p>9 rigs doing kind of oil well drilling, Smith's</p> <p>10 clients, they either owned or operated the rig you</p> <p>11 were on?</p> <p>12 A I would say a hundred percent of times they did</p> <p>13 not. The rig is actually owned by another service</p> <p>14 company just like Smith, so it'd be -- like Chevron</p> <p>15 is the oil company, Transocean would be the rig,</p> <p>16 they would own the rig and -- just like we would</p> <p>17 own the reamers.</p> <p>18 Q Okay, and then you were there and providing</p> <p>19 services to Chevron overall as part of that --</p> <p>20 A Correct.</p> <p>21 Q -- operation? Okay. And part of Smith's business,</p> <p>22 as you said, was providing reamer tools and</p> <p>23 personnel to an oil and gas exploration company,</p> <p>24 correct?</p> <p>25 A Correct.</p>
<p style="text-align: right;">91</p> <p>1 Q And when -- your kind of role when you go to the</p> <p>2 rig is you're there as like the expert on the</p> <p>3 reaming tool; is that correct?</p> <p>4 MR. ST. PE':</p> <p>5 Object to the form. Go ahead.</p> <p>6 THE WITNESS:</p> <p>7 Huh?</p> <p>8 MR. ST. PE':</p> <p>9 I just made an objection for the record.</p> <p>10 BY MR. BOWDLER:</p> <p>11 Q Yeah, you can go ahead and answer?</p> <p>12 A Okay, so I represented -- I ran that tool, so I'm</p> <p>13 really the only one that knows how to run that</p> <p>14 particular tool, and it's not necessarily just</p> <p>15 running it, it's representing it. For example, if</p> <p>16 you had to bit, and we were drilling and we was</p> <p>17 putting 20,000 pounds on it, rotating, you know,</p> <p>18 100 RPMs, that might be what's best for the bit,</p> <p>19 that might be destroying the reamer. So I'm there</p> <p>20 to advocate for my tool to make my tool last, so</p> <p>21 that's why each tool has its own representative,</p> <p>22 that way someone else don't sacrifice someone</p> <p>23 else's tool to benefit their own. Does that make</p> <p>24 sense?</p> <p>25 Q Yeah, so in part, you're there to kind of watch</p>	<p style="text-align: right;">92</p> <p>1 after your tool?</p> <p>2 A My job is solely for the reamer and that's because</p> <p>3 everyone else has their job solely for their tool</p> <p>4 to make sure my tool's optimized to run correctly</p> <p>5 and protect it in the right way and not get</p> <p>6 destroyed. Because if your tool is the one that</p> <p>7 makes you trip on the hole, that could cost them</p> <p>8 millions, so you want to make sure your stuff is</p> <p>9 protected and you work -- you've -- I mean, I've</p> <p>10 got to work together with everyone else, you know.</p> <p>11 If my tool works best at this and their tool works</p> <p>12 best at this, we're gonna have to find some kind of</p> <p>13 happy medium to where we get the job done without</p> <p>14 destroying each other's tools.</p> <p>15 Q And when you're on the rig, you're not actually --</p> <p>16 when we talk about operating the reamer, you're</p> <p>17 not -- are you literally at the controls kind of</p> <p>18 running the tool, running the drill string, or?</p> <p>19 A So the rig hands operate the rig. We're not</p> <p>20 allowed to do that, but we -- I mean, we set the</p> <p>21 standards on what they can do, and we're also there</p> <p>22 to change things as you need to change them, and</p> <p>23 that could be by the minute. I mean, you could be</p> <p>24 drilling here in sand, well, now you got to slow</p> <p>25 your rotary down and put less weight, but ten</p>

<p style="text-align: right;">93</p> <p>1 minutes later, you're in, you know, shell. So you 2 got to increase your rotary and put more weight, so 3 we don't physically hold the button, but we're 4 the -- we work together -- you know, it's a huge 5 crew. I don't know if you've ever been on a rig, 6 so you -- you got your driller, AD and all the 7 floor hands, and you've also got your reamer hand, 8 your directional driller, NWD, mud engineer, 9 everybody else is also in that room at the same 10 time, that way when things change, you know, one 11 person says we need to do this, and I'll be like, 12 well no, that's bad for this or we need to do this 13 and then you come up with a collaborative plan to 14 continue. 15 Q Yeah, so for example, the directional driller might 16 say we need to put 10,000 more pounds of weight on 17 a bit and you're gonna say, no, that's gonna be 18 really bad for the reamer 19 A Correct. 20 Q -- and the big guy might say something else and 21 then you guys have to collaborate and come up with 22 what to do? 23 A Right, and if anything falls -- so say my standard 24 operating procedure says, all right, when I'm in 25 sand, I can put between 10,000 and 30,000 pounds,</p>	<p style="text-align: right;">94</p> <p>1 anything above that, I've got to do the management 2 of change procedure, call David and say, hey look, 3 you know, the collective agreement -- or what we're 4 coming up with is we need to put more weight than 5 what we're supposed to. I don't have the 6 authorization to do that, so I got to go through 7 this thing and say, hey look, we need to do this 8 and then they say yes or no. They're the one who 9 make the -- that decision, I guess. 10 Q Yeah, they're the ones who have to go to the client 11 and say you're exceeding our specs, you know, 12 you've got to -- 13 A Right, or their the one that says, well, we 14 temporarily approve to go over the specs because if 15 you do that and something happens -- like I said, I 16 mean, you make a mistake out there and it could 17 cost 50 million dollars, right? So, you know, I 18 don't have the authorization to make a decision 19 that's worth 50 million dollars, so that's why they 20 make it. That way, if something happens, they take 21 the blame. 22 Q And as part of that collaborative kind of effort, 23 you get to the point where you're -- the team says, 24 okay, goes to the driller and says, you know, 25 change the RPMs to this and then the driller does</p>
<p style="text-align: right;">95</p> <p>1 that? 2 A Correct, and a lot of those decisions -- you know, 3 it's not like let's just make the decision. I 4 mean, there's a lot of calculations involved in 5 that. You know, sometimes I've got to go 6 re-measure something, re-measure another tool to 7 figure out what's causing these problems. You 8 know, there's been times where we'd go set up a 9 whole other string on the -- on the deck to emulate 10 it to try and figure out what the problem is. 11 Q Is that part of the -- your job is operating the 12 tool. You're there, you're making sure that the 13 crew and the driller, they're running the reamer 14 properly and correctly, correct? 15 A Correct. Now, there's jobs that are reamer only 16 jobs where I'm the only one who makes the decision, 17 too, you know, so. Cause there's no other tools 18 competing. 19 Q Right, so you're the only one -- you're the one 20 making the decision, wait, I'll bit this, RPM's 21 this, flow rate that, that sort of thing? 22 A Correct. 23 Q And you're doing that based on, you know, you're 24 monitoring the data that's coming up out of the 25 well and making those decisions?</p>	<p style="text-align: right;">96</p> <p>1 A Correct. You have to make those decisions 2 realtime. 3 Q Right, and your supervisor's not on the rig with 4 you, you know, kind of over your shoulder. You're 5 there doing that yourself? 6 A That's correct, but like I say, you know, you go 7 out there with set parameters. If anything falls 8 out of that parameter, then you have to notify the 9 supervisor to get the change. 10 Q Right. When you're on the rig, what are some of 11 the -- some of the manual labor tasks that you 12 would be required to perform? 13 A You know, the measurement of tools is very manual 14 because you have a basket full of tools, different 15 tools are on top of each other, so you're moving 16 around different parts that weigh, you know, 17 anywhere from 10 to 100s of pounds. So, you know, 18 anything over 50, 60 pounds, you start -- you know, 19 you need to get a crane for and then that means 20 you've got to rig up all the rigging to move it 21 around. You're constantly moving equipment or 22 screwing together pieces of equipment, which 23 don't -- it's not like screwing a cap there. 24 It's -- you're screwing 200-pound pieces or using 25 big chain tongs, you know, six foot trying to</p>

<p style="text-align: right;">97</p> <p>1 tighten these things together. All the equipment, 2 you've got to drop the balls through and fish it 3 and take big pools and push things through, 4 thousands of stairs that you got to climb up going 5 to and from the rig. You know, these rigs are 6 really high. You know, it's constant all day going 7 up and down, up and down, up and down. When you're 8 on the rig, you got things you got to do. You've 9 got to set slips. I have to -- like for the XC, I 10 mean, you got to unscrew, do ball tests, change 11 nozzles, change blades. You know, these blades are 12 30, 40 pounds apiece. I don't know, it's -- it's a 13 lot. 14 Q And are those all things that you, yourself, are 15 doing or is the rig crew doing that, or? 16 A No, that's me. 17 Q That's you doing that? 18 A I mean, sometimes I have help. You know, if I have 19 to move an 800-pound reamer, you know, I go there, 20 I strap everything up and then I call the crane and 21 the crane lifts it up and then I walk with it, set 22 it down. But it's -- I mean, it's not like I just 23 go over there and say, hey, go measure this for me. 24 I mean, you have to physically do it, I mean, cause 25 you're talking down to the tenth of an inch, so it</p>	<p style="text-align: right;">98</p> <p>1 has to be right. 2 Q How much of your time -- when you're on a rig, 3 about how much of your time is spent doing these 4 manual labor tasks? 5 A I mean, that varies. Fifty percent. I don't know, 6 it just depends on what kind of job. I mean, there 7 are jobs where you're tripping it out the hole once 8 a day and then there's a job that you're drilling 9 for four days straight, so it just depends on the 10 job and where you're at. Usually, land jobs are 11 typically more labor-intensive. There's less 12 personnel to help you, there's more -- you know, 13 you're not drilling as deep. So offshore, it takes 14 you, you know, 20 hours to trip in the hope where 15 on land, in three hours, you're ready to go and 16 you're in and out, in and out. So it varies. I 17 mean, there might be five or six days where I'm 18 not -- where I don't have to swing a hammer, but 19 I'm still doing other physical things, I mean. 20 Q What other kind of physical things that you -- 21 A I mean, everything you do, you do every few days. 22 I mean, it's not like you do it one time and then 23 you're done. I mean, cause you're coming in and 24 out the hole with new tools all the time. So, you 25 know, when I measure one, I get everything ready,</p>
<p style="text-align: right;">99</p> <p>1 we put it up. When we're drilling, I'm already 2 starting on the next one to make sure -- you know, 3 if you have a problem, you always have to have a 4 backup of everything. And if we run that second 5 one, I'm already ordering a new one from the shop. 6 When the new one comes out, I got to redo 7 everything, again. 8 Whenever you're working in the oil industry, 9 especially deep water where it's costing the oil 10 company a million dollars a day, you got to be two 11 and three steps ahead because you make -- I mean, 12 you make one silly mistake as, I forgot a little 13 tool like this (indicating), and it's not there 14 when they need it, you can shut something down for 15 two days waiting for it. So you cost them two 16 million dollars, they're not gonna be happy with 17 you. 18 So you are doing the job, you're checking your 19 stuff and then you recheck it. And if you're 20 sitting down for a day and a half and you ain't 21 done nothing, you better go recheck it, again, 22 because if you're the type of person that made a 23 mistake, something as simple as that, you wouldn't 24 be working for Schlumberger or anyone, and then 25 you'll get a reputation with the oil company and</p>	<p style="text-align: right;">100</p> <p>1 then whenever Chevron's calling Schlumberger 2 saying, hey, I need a reamer hand, just make sure 3 you don't send Jack. You know, you don't want that 4 because they don't forget. No one forgets. 5 So, I mean, it's a lot of redundant, doing the 6 same things over and over. I mean, I don't know 7 where this is going, to be honest. I don't 8 understand what's the difference between physical 9 or not, but you know, if I'm staying up 30 hours, 10 that's physical, to me. You know, if I got to stay 11 up 30 hours and then climb 10 flights of stairs 12 12 times a day, that's not easy. So I don't -- I 13 don't know. I mean, do I go 12 hours swinging a 14 hammer all 12 hours? No. Am I doing physical 15 work? Yes. 16 Q Based on your experience, what's the main reason 17 why you're out on a rig; like, what's your main job 18 that you're out there to do? 19 A Assist in the drilling operations and make sure 20 that I'm running my tool correctly and supporting 21 my tool. And it's not just my tool, I'm supporting 22 everything. I mean, everybody works as a team out 23 there. You know, if I see someone else's stuff 24 messing up, you know, I also work together with 25 them to correct it. I mean, it's not just -- and</p>

<p style="text-align: right;">101</p> <p>1 when you go out there, you're working as a team and 2 nothing gets done without a team. If everybody 3 went out there and said, I'm only helping 4 Schlumberger and you're only helping Haliburton and 5 you're only helping Baker and you're working for 6 the oil company, if everybody did that, then no one 7 would get anything done. So there's compromises 8 all day, every day and they're working together. 9 That's why you have ten meetings a day on what's 10 going on, what needs to be done, so. 11 Q No, no. I understand. So for going out to the 12 rig, you would -- you said kind of going back to a 13 typical job cycle, you would go down, first, to the 14 shop, check your tools. About how long does that 15 process take, how long are you in the shop on that 16 kind of initial -- 17 A Depending on the job and what you got to do, if 18 it's really busy, I might have to go down and spend 19 a day or two days cause I might have to help 20 assemble the tools. Cause, you know, there's 21 designated people in the shop, that's all they do 22 is tear down tools and put new ones together. So, 23 say, the shop wasn't that busy, I might get over 24 there and everything is done for me, as far as 25 putting it together. So then I'm just doing</p>	<p style="text-align: right;">102</p> <p>1 inventory making sure it's put together correctly 2 and sometimes I try and premeasure where I go out 3 there and I measure everything and I take a paint 4 stick and write the measurements that way when I 5 get to the rig, I'm just confirming. You know, I 6 re-measure it and, ope, that's right, that's right 7 and then I draw in my tally book -- I should've 8 brought some tally books. I got some of those of 9 what I do as far as measuring the tools and stuff. 10 Cause that really sounds like I don't do nothing, 11 but it's really -- it's really time-consuming. I 12 mean, you know, a tool the size of this table, you 13 can't measure it in ten minutes. I mean, it takes 14 you an hour, two hours to measure -- I mean, you're 15 literally measuring everything. Like this bottle 16 (indicating), every little ridge is a new 17 measurement. So you got to measure from here to 18 here, here to here, here to here, here to here, 19 here to here, then you got to take some mics and be 20 like, all right, this is this wide, but then 21 there's a groove, you know, this is two-tenths of 22 an inch smaller. You've got to put all that 23 because everything -- you fill the fluid with -- 24 the hole with fluid, right? So you need to know 25 exactly how much fluid that tool displaces. And</p>
<p style="text-align: right;">103</p> <p>1 every little hangup, so you go down the hole and 2 you hit something, I need to know exactly where 3 that lip is. So, I mean, it's -- it takes a long 4 time. 5 Q Okay, and you said sometimes if the shop was busy, 6 you would have to assemble the tools yourself? 7 A Correct. 8 Q And that, I guess, involves like screwing the 9 pieces together and doing all that kind of stuff? 10 A Uh-huh (yes). Yeah, just the -- I mean, a reamer 11 has many parts. It's not just like one tool. Each 12 one of those parts weighs a lot, so I mean, you got 13 to -- it comes as a shell and you got to go to 14 the -- the shell, it takes you quite a few hours. 15 You're taking each piece and assembling and 16 screwing each piece together. The internal of the 17 reamer is what takes -- it's a lot of stuff in 18 there. 19 Q And just to the extent you can remember, about how 20 often when you would go to the shop did you -- 21 things were done for you and you just kind of had 22 to measure and it was quiet versus how often did 23 you have to assemble everything? 24 A So usually whenever it's all measured for me, you 25 still go to the shop and confirm everything and</p>	<p style="text-align: right;">104</p> <p>1 then watch them test it. Every tool has to be 2 tested before it goes out. I'd say about 50 3 percent of the time the tool was assembled when I 4 got there. Yeah, I'd say about -- at least half 5 the time it was already assembled. There were 6 times where it was an emergency job and I never 7 even got a chance to go to the shop and I just went 8 straight to the rig and then when I got there, 9 that's when you have to be very diligent, hurry up 10 and check everything cause if there's a problem 11 there, it's like let's stick this back on the boat 12 and send me another one, and that's happened 13 numerous times. 14 Q Okay, and then just, when you would then go to 15 the -- you know, for transport to the rig, about 16 how long would that take, I guess, the helicopter 17 or boat ride out to the rig? It just depends how 18 far -- 19 A Yeah, it depends. I mean, I've driven to Carencro 20 for a job, you know, which is 30 minutes away. 21 It's like -- I've driven 30 minutes away and I've 22 driven 20 hours away. Or, you know, you drive to 23 the dock and it might be a 30-minute flight, it 24 might be a 3-hour flight. It just depends. I 25 mean, sometimes you go to the heliport and you wait</p>

<p style="text-align: right;">105</p> <p>1 nine hours waiting for a helicopter and then 2 another hour flight. And a lot of times, you -- 3 like when I -- I live in Lafayette, so when I got 4 to be at the rig for 8:00 in the morning, that 5 means I'm leaving at 11 o'clock at night, you know, 6 four or five hours of driving, checking in and then 7 you get to the rig about 8 o'clock in the morning, 8 but then you don't -- you know, you got to work all 9 day. You know, you don't get to -- just cause 10 you've been up all day traveling don't mean when 11 you get there, I'm going to sleep, I'll be with 12 y'all in eight hours. You work all day, also, and 13 then, you know, it just depends what you're doing 14 and it depends where the rig is at in their 15 process. 16 Q Right, so if you get to the rig and like say 17 they're running casing and they're not ready for 18 you, it could be -- you'll measure and strap your 19 tools and then, you know, check and double-check, 20 but it still could be a couple days before you get 21 to drilling operations? 22 A It's rarely a couple days, but yeah, sometimes it 23 might -- you might be able to get out there -- you 24 know, no matter what, you got a full day of 25 measuring and collaborating with everyone else and</p>	<p style="text-align: right;">106</p> <p>1 checking all the tools there. But, you know, some 2 days after you do all that, you know, you might be 3 able to go to sleep the whole night and wake up the 4 next day. If you look at the industry as far as 5 reamer hands, we're a little different. Because, 6 you know, when I first started, it wasn't, but for 7 example, you know what a directional driller is? 8 Q Yes. 9 A Okay, so many years ago, directional drillers used 10 to go out by themselves, and then over time, the 11 industry changed. All right, well, we don't want 12 our directional drillers staying up 40 hours, we're 13 gonna get 2. So most of the industries are 14 getting, you know, where you work 12 hours on, 12 15 hours off, 12 hours on, 12 hours off. There's only 16 a few jobs left that I can recall in the oilfield 17 that you still do by yourself. The reamer hands is 18 one, fishing tool hand is another, hanger hand 19 sometimes. I mean, there's not many because of the 20 long hours. You know, it's not as safe anymore, so 21 the industry's changing, but reamer hands are -- 22 we're still one that you went out by yourself. And 23 when you're a representative by yourself, you're 24 working for Schlumberger, but you're contracted to, 25 you know, Chevron or Shell. So you got that Shell</p>
<p style="text-align: right;">107</p> <p>1 representative who's, you know, high almighty 2 there, when you get on a rig at 8 o'clock in the 3 morning, even though they're not ready for you, you 4 better be in that office that way when that man 5 walks past, you're there. Cause if you're in your 6 room, that's not a good sign. You don't want to be 7 the guy in bed. So during business hours, you 8 better be awake and you better be sitting in front 9 of your computer or something, not in the TV room 10 or not somewheres. 11 Q So when you're on the rig as the only reamer hand, 12 how is it -- I mean, cause there's got to be 13 sometime, I would presume, for you to be able to 14 get some rest because it's just not safe, 15 otherwise; how does that work? 16 A So it is 100 percent situational. You know, at 17 times if they're running casing, you know, you do 18 as much as you can during the day and then at night 19 you can go to sleep. Where you really run into 20 long hours is your first days where you're doing 21 everything and you traveled all night. And then 22 during drilling, which is most of the time. So 23 being the representative for the reamer, you have 24 to be up, basically, the entire time you're 25 drilling, and it could be seven days, right? So,</p>	<p style="text-align: right;">108</p> <p>1 of course, you can't stay up seven days, so you 2 literally -- you know, you stay up 20, 30 hours and 3 then you -- you have to time your sleep, you know, 4 because you don't know what it is. And it also 5 depends on, you know, are you drilling through 6 shell and you got a thousand foot of shell left and 7 you know for the next eight hours, you could pretty 8 much keep it the same, so you hurry up and go try 9 and take a nap and you sleep a little while. And 10 then, you know, if something happens, they call 11 you. They wake you up for anything, oh, the RPMs, 12 we're changing it by ten, we need you to come see. 13 So a lot of times, you don't get good sleep, 14 you know. Or sometimes you just sit in a chair and 15 you sleep in the drilling shack. You know, they 16 know you've been up for a long time, so you just 17 doze off. You sleep where you can. And it depends 18 on how the job -- if you're drilling through sand, 19 you're not going to sleep. Or if you're drilling 20 through gumbo, you're probably not going to sleep. 21 You just sleep where you can. 22 The typical day for me would be, I'm up at 23 least 18 hours a day, most of the time. If you're 24 there, you're expected to be on the rig floor. You 25 know, of course, they understand you got to get</p>

<p style="text-align: right;">109</p> <p>1 some sleep sometime, but it's not like I'll work a 2 shift, I'm gonna work eight hours and then I'm 3 gonna go watch TV. That's not what you get to do 4 as a reamer hand. You work until you can't work no 5 more and then you sleep a little bit and hurry up 6 and, you know, take a shower, eat, back on the rig 7 floor. And that's what you do during the time 8 you're drilling.</p> <p>9 The only time you get time to sleep is when 10 they're going in the hole -- that might take, you 11 know, 12 hours. You hurry up, you get your -- 12 sleep as much as you can, and then they come -- 13 well, after you finish drilling, you have to stay 14 until you get into the casing. Once you're in the 15 casing, you can hurry up -- you got to hurry up and 16 try and sleep because it might be 6 hours, it might 17 be 8 hours, it might be 3 hours. Because as soon 18 as it comes out of the hole, you got to be there to 19 inspect your tool and stuff like that.</p> <p>20 Q Right, and so while the drilling is going on, what 21 is it you, as the reamer hand, are doing? I know 22 you're in the drilling shack and, I guess, you're 23 monitoring the data that's coming up out of the 24 hole?</p> <p>25 A Uh-huh (yes). So it's not necessarily -- well, I</p>	<p style="text-align: right;">110</p> <p>1 guess it's data, but. Say I'm sitting in there, 2 you have a weight indicator and a big scale doing 3 this number right here (demonstrating) telling you 4 how much weight you got to put in. You can see the 5 RPMs, so you're monitoring it live the whole time 6 and making changes, you know, amongst -- with 7 everybody else in the room as that time goes by. 8 And then you're also -- you know, you're going up 9 and down checking other tools at the same time, so 10 being on the rig monitoring it is fine, you just 11 have to be around. So you can multitask. You 12 know, I could go measure a tool and I'm right 13 there, and if they need me, they just say, hey 14 Jack, come back to the rig floor or something. So 15 it's just constant being there and having good 16 situational awareness, I guess.</p> <p>17 Q And -- well, you said you have for the tool like a 18 set of parameters that you can operate in, correct?</p> <p>19 A Uh-huh (yes).</p> <p>20 Q And while you're there on the rig, you're -- in 21 collaboration with everybody else, you can adjust 22 the parameters where -- or suggested adjustments 23 within those parameters as you're drilling, 24 correct?</p> <p>25 A Correct.</p>
<p style="text-align: right;">111</p> <p>1 Q And, in part, that's what your job is there to do?</p> <p>2 A Part, yeah.</p> <p>3 Q Yeah. Okay.</p> <p>4 A I mean, some of these adjustments happen quickly. 5 Cause, like I say, I mean, when you're drilling, 6 you're drilling thousands of feet, but within that 7 thousand feet, you might have -- they call them 8 stringers, just like a little strip of sand that -- 9 it might be only ten foot of sand and you're 10 drilling through shell and all of a sudden you just 11 hit something, like pfff, it ain't going nowhere. 12 So you got to hurry up and change the parameters to 13 drill through that and then ten foot later, you're 14 changing them back to optimize your drilling.</p> <p>15 Q And you're there for -- and part of it, you are 16 there to -- you're there for the reaming tool to 17 say this is what I think we need to do to optimize 18 at least the operation of the reaming tool?</p> <p>19 A Of the reaming tool, yes.</p> <p>20 Q Okay, and then come -- in conjunction with 21 everybody else, you come up with what the drillers 22 and you actually do?</p> <p>23 A Correct.</p> <p>24 Q And I think you said part of your job, too, out 25 there is to -- is for like inventory control,</p>	<p style="text-align: right;">112</p> <p>1 making sure you have the tools that you're gonna 2 need. I think you said you're keeping two or three 3 steps ahead of the drilling process?</p> <p>4 A Uh-huh (yes).</p> <p>5 Q Okay, and part of that is kind of understanding 6 what's in the hole, what you have and what you're 7 gonna need and kind of juggling those balls?</p> <p>8 A Correct, and those needs change sometimes, so -- 9 because there's nothing constant in drilling. So 10 the plan might be, we're gonna drill 5,000 foot and 11 put 9-inch casing, and then we're gonna go to 12 6-inch casing. Well, you might drill 5,000 foot, 13 hit something you can't go through or have a leak 14 or the well's changing, so then you got to change 15 it. All right, well, now we're gonna drive 5,000 16 foot of 9-inch casing and then we're gonna put -- 17 since we can't go all the way down, now we got to 18 do from 9 to 7 to 6 instead of from 9 straight to 19 6, so once the decision is made, I have to hurry up 20 and order new tools, inspect new tools because 21 that's -- everything's new. So, you know, plans 22 change constantly.</p> <p>23 Q And when you would first get on the rig, I think 24 you said, you would meet with the company man when 25 you first got there?</p>

<p style="text-align: right;">113</p> <p>1 A That's correct.</p> <p>2 Q What are some of the things you would discuss with</p> <p>3 the company man when you first arrived?</p> <p>4 A So I would introduce myself. For the -- you know,</p> <p>5 majority of the time, they've seen me before, so</p> <p>6 I'd let him know I'm here, let him know what tools</p> <p>7 I have, make him aware that I'm going check my</p> <p>8 stuff, cause if you don't, then he's gonna come</p> <p>9 find you and be like, hey, did you check your</p> <p>10 stuff. I would give him information on the tools,</p> <p>11 then once I have all my measurements, I bring him</p> <p>12 copies of all the measurements and all the</p> <p>13 documents that way he has it and he's also aware</p> <p>14 that I did it.</p> <p>15 I also check with him on what's the plan,</p> <p>16 what's currently going on, when they gonna need me</p> <p>17 and when they'll be ready for me. And then I make</p> <p>18 my way from him and I talk to the directional</p> <p>19 driller and the mud engineer and everybody else.</p> <p>20 Q And when -- after you -- if you had to, after you</p> <p>21 strap the tools and do whatever assembly that you</p> <p>22 need to do, it would be the rig crew that would</p> <p>23 attach the reaming tool to the BHA; is that</p> <p>24 correct?</p> <p>25 A I mean, we would do it. I mean, I -- I physically</p>	<p style="text-align: right;">114</p> <p>1 screw it together to make sure it's done right,</p> <p>2 make sure it's not cross-threaded, but do I</p> <p>3 physically put 96,000 pounds of pressure? No, it</p> <p>4 takes another piece of equipment to do it, and the</p> <p>5 rig crew operates that equipment.</p> <p>6 Q Okay, and you're there making sure they do it right</p> <p>7 and --</p> <p>8 A Correct, so --</p> <p>9 Q -- within specs?</p> <p>10 A So every time something is screwed together, I have</p> <p>11 to be there. So what I do is, you know, you pick</p> <p>12 it up with a crane and put a stabbing guide around</p> <p>13 it, that way, you know, you don't damage the</p> <p>14 threads when you're hitting it, so you know, I</p> <p>15 guide it in there. Once it's in there, I take a</p> <p>16 big chain wrench, I put it on there and I</p> <p>17 physically screw it together to the point where</p> <p>18 it's as far as you can get by hand. Then they take</p> <p>19 one of those tongs we was talking about earlier,</p> <p>20 they bring that on together and that's what</p> <p>21 tightens it. And then when they're doing that, I</p> <p>22 have to be watching the gauge to make sure they put</p> <p>23 exactly the amount of torque necessary -- it might</p> <p>24 be 48 or it might be 96, depending on how big it</p> <p>25 is.</p>
<p style="text-align: right;">115</p> <p>1 Q Okay.</p> <p>2 A And then after that, you know, you lower it down to</p> <p>3 the middle of the tool where I do my inspections.</p> <p>4 I've got to unscrew some stuff to put some new jets</p> <p>5 in and then test the tool to make sure it opens and</p> <p>6 closes, and you go down and do the next connection</p> <p>7 and just repeat.</p> <p>8 Q Okay.</p> <p>9 A I mean, there's a lot of things that I do, but you</p> <p>10 know, it's just too heavy. You've got to have a</p> <p>11 crane or you need more than one person to pick up.</p> <p>12 Q Right, okay.</p> <p>13 MR. BOWDLER:</p> <p>14 Off the record for a second.</p> <p>15 (REPORTER'S NOTE:</p> <p>16 Whereupon a short break was taken, after</p> <p>17 which the proceedings continued as follows:)</p> <p>18 BY MR. BOWDLER:</p> <p>19 Q While you were on the rig, what was the majority of</p> <p>20 your time spent doing?</p> <p>21 A Drilling.</p> <p>22 Q Okay, you were there and you guys were monitoring</p> <p>23 the information and changing the drilling</p> <p>24 parameters and stuff like that to maximize</p> <p>25 everybody's tool operation, correct?</p>	<p style="text-align: right;">116</p> <p>1 A Yes.</p> <p>2 Q And when you guys would -- and I guess it's called</p> <p>3 trip in the hole, right, is when you start going</p> <p>4 down and you get to the bottom. Would there be a</p> <p>5 set of parameters -- well, what were you doing</p> <p>6 while you guys would trip in the hole? Like, were</p> <p>7 you having to monitor anything or I think you said</p> <p>8 that was the time when you, most likely, could get</p> <p>9 some rest if they're tripping the hole?</p> <p>10 A Right, unless it was an XC tool, which is</p> <p>11 hydraulically activated, then you have to watch it</p> <p>12 at all times.</p> <p>13 Q Yeah, and I think, like all the other tools, you're</p> <p>14 checking to make sure it doesn't open and operate</p> <p>15 while you're going through and especially while</p> <p>16 you're in the casing?</p> <p>17 A Yes.</p> <p>18 Q And, I guess, how would you know if the tool</p> <p>19 started operating while you were tripping a hole?</p> <p>20 A If it would open in the hole, you'd start to see</p> <p>21 dragging or it would stop. It would catch on</p> <p>22 something or you have more weight -- bit weight.</p> <p>23 Q And so one of the -- I guess one of the bits of</p> <p>24 information, also, would look different and you</p> <p>25 would look at that and say, oh, I think the tool</p>

<p style="text-align: right;">117</p> <p>1 might've just opened and you'd alert the driller?</p> <p>2 A Correct.</p> <p>3 Q Was there any kind of check sheet or manual that</p> <p>4 you had to follow that would say, oh, X happened,</p> <p>5 so therefore, it's Y and I need to tell the</p> <p>6 driller?</p> <p>7 A No, not the -- I mean, unless it was in the</p> <p>8 standard operating procedure. I don't think</p> <p>9 there's a checklist. There's multiple things that</p> <p>10 can cause the same symptom, I guess. So if we</p> <p>11 would notice a symptom, then we troubleshoot to try</p> <p>12 and figure out whose tool is causing it. So it</p> <p>13 could be other things, other than my tool, creating</p> <p>14 the symptom.</p> <p>15 Q Okay, and you mentioned the standard work</p> <p>16 instruction. You had standard work instructions</p> <p>17 when you were out on the rig?</p> <p>18 A No, it wasn't really standard operating procedure,</p> <p>19 but there was a reamer manual that gave basic</p> <p>20 information or a handbook or something. I don't</p> <p>21 know what they called it.</p> <p>22 Q And it would --</p> <p>23 MR. ST. PE':</p> <p>24 I'm sorry, don't let me forget, I have a</p> <p>25 pre-trial conference with Judge Juneau at</p>	<p style="text-align: right;">118</p> <p>1 1:30.</p> <p>2 (REPORTER'S NOTE:</p> <p>3 Whereupon an off-the-record discussion</p> <p>4 was held, after which the proceedings</p> <p>5 continued as follows:)</p> <p>6 BY MR. BOWDLER:</p> <p>7 Q And the reamer manual, that's just some basic</p> <p>8 information, does it give you kind of a</p> <p>9 step-by-step guide of --</p> <p>10 A I don't think it gave a step-by-step guide. It's</p> <p>11 just specifications and torque specifications and</p> <p>12 stuff like that.</p> <p>13 Q So is it fair to say, part of your job is when</p> <p>14 you're getting the information -- the various</p> <p>15 information -- you sort of have to project that</p> <p>16 down to your tool and kind of see what you think is</p> <p>17 going on and use that data and understand what's</p> <p>18 going on in the hole and trying to help figure out</p> <p>19 what -- if there's a problem?</p> <p>20 A I mean, you have to look at all of the --</p> <p>21 everything going on and use your judgment to try</p> <p>22 and guess what the problem is and try different</p> <p>23 things to solve the problem.</p> <p>24 Q Okay, and you had mentioned one of the reamers that</p> <p>25 is activated by a ball and it's literally -- I</p>
<p style="text-align: right;">119</p> <p>1 think you drop the ball down the pipes and when it</p> <p>2 hits the bottom, it turns on the reamer?</p> <p>3 A Correct.</p> <p>4 Q And you said as part of the measurements, you're</p> <p>5 also looking at everybody else's tool to make sure</p> <p>6 your ball will fit so you can actually activate the</p> <p>7 tool, correct?</p> <p>8 A Correct.</p> <p>9 Q Do you ever have a situation where you looked at it</p> <p>10 and you realized your ball wasn't gonna fit through</p> <p>11 the other tools in the string?</p> <p>12 A Yes.</p> <p>13 Q Okay, what do you do in that situation?</p> <p>14 A You do a change order. You notify -- well, most of</p> <p>15 the time, if you find that, I would go to the</p> <p>16 company man, let him know what I found and then</p> <p>17 they would have to -- if it wasn't my tool, that</p> <p>18 company would have to change their tool. And it</p> <p>19 might be something as easy as just getting a</p> <p>20 different size where my ball will fall through it.</p> <p>21 And just not knowing the size, you've got to check</p> <p>22 and I've got to go get my 50-pound rod and slide it</p> <p>23 through every piece that goes above and they call</p> <p>24 it rabbiting, so it's a long piece of metal that --</p> <p>25 so say my ball's two and three quarters, I get a</p>	<p style="text-align: right;">120</p> <p>1 three-inch rabbit and I slide it through every</p> <p>2 piece of equipment, and if it doesn't go through,</p> <p>3 then I actually grab my ball and I push it through</p> <p>4 to make sure it goes through cause if it doesn't,</p> <p>5 that's a problem.</p> <p>6 Q And when you are dropping the ball to activate it,</p> <p>7 do you actually do the -- do you actually go into</p> <p>8 the --</p> <p>9 A Uh-huh (yes).</p> <p>10 Q -- you actually do?</p> <p>11 A Yes.</p> <p>12 Q And, as I understand, the ball goes down and</p> <p>13 there's a little seat and it hits it and then it</p> <p>14 pushes the outside of the reamer --</p> <p>15 A Correct.</p> <p>16 Q -- I guess those are the bits -- the cutting</p> <p>17 blades?</p> <p>18 A The blades, yes.</p> <p>19 Q Okay, and at what point do you know when it's time</p> <p>20 to activate the reamer; is that -- I guess who</p> <p>21 makes that decision like, okay, now it's time,</p> <p>22 let's drop the ball and get the reamer going?</p> <p>23 A So that's a pre-determined depth set forth by the</p> <p>24 company and what their plans for the weld is. It's</p> <p>25 usually right outside of the previous casing. Once</p>

<p style="text-align: right;">121</p> <p>1 you exit the casing, then you open it up right</p> <p>2 there. And then once I open it, I have to perform</p> <p>3 numerous tests to make sure it's open and operating</p> <p>4 correctly.</p> <p>5 Q I think I heard one of them was called the pole</p> <p>6 test?</p> <p>7 A Correct.</p> <p>8 Q And, I guess, that's the same thing, you're telling</p> <p>9 the driller, hey, pull back or do something on the</p> <p>10 RPMs and you're looking at the data to make sure</p> <p>11 the tool's actually activated?</p> <p>12 A Correct.</p> <p>13 Q And, I guess, as I understand, one of the things</p> <p>14 you look for is if the tool is activated, there</p> <p>15 should be a change in the pump pressure?</p> <p>16 A Correct.</p> <p>17 Q And it should decrease because I think the sides</p> <p>18 have opened, so some fluid should be escaping?</p> <p>19 A That's correct, yeah.</p> <p>20 Q And if you the test -- if you activate it and you</p> <p>21 don't see the pump pressure change, that's a --</p> <p>22 that would be suggesting to you that the tool</p> <p>23 didn't activate, correct?</p> <p>24 A That's correct.</p> <p>25 Q Okay, and then from there, you would have to, I</p>	<p style="text-align: right;">122</p> <p>1 guess, troubleshoot to figure out why and what's</p> <p>2 going on?</p> <p>3 A Correct.</p> <p>4 Q Okay. And then once the tool's activated, the</p> <p>5 driller then kind of -- and you know -- you've run</p> <p>6 your tests and you know it's activated and the</p> <p>7 driller is then gonna proceed ahead with the reamer</p> <p>8 operating; is that correct?</p> <p>9 A So then you continue to drill with the tool open,</p> <p>10 but I need to make sure it stays open and it</p> <p>11 doesn't change the parameters too much.</p> <p>12 Q Right. Right, so if you have it open and you</p> <p>13 realize it's causing the RPMs to drop</p> <p>14 significantly, you have to figure out -- and this,</p> <p>15 again, a collaborative effort of figuring out what</p> <p>16 the right RPM is to get -- to get the drill bit and</p> <p>17 the reamer operating optimally?</p> <p>18 A Yes.</p> <p>19 Q And I think you said before, you're also monitoring</p> <p>20 kind of the formation that you're in or -- so do</p> <p>21 you also get the gamma ray logs?</p> <p>22 A I do.</p> <p>23 Q And, I guess, do you understand them? Cause I know</p> <p>24 I don't.</p> <p>25 A So we understand the parts that pertain to my job.</p>
<p style="text-align: right;">123</p> <p>1 I wouldn't say I'm a -- I understand all of it, but</p> <p>2 I can look at it enough to determine a change in</p> <p>3 formation. What that formation is, I won't know,</p> <p>4 but I can tell, hey, something's coming up.</p> <p>5 Q And then changes in formation affect the operation</p> <p>6 of the reamer, correct?</p> <p>7 A That's correct.</p> <p>8 Q Okay, and you, as the reamer hand, need to know</p> <p>9 what formation you're drilling in, correct?</p> <p>10 A Correct. I mean, it drastically helps you if you</p> <p>11 understand what you're drilling through. I'm not</p> <p>12 gonna say every reamer hand understands that, but</p> <p>13 those are -- it's one of the things that separates</p> <p>14 a good reamer hand from the bad one.</p> <p>15 Q And is part of it -- from your experience, you</p> <p>16 learn, well, if I'm in limestone, I know how the</p> <p>17 reamer should be reacting versus, say, sand or</p> <p>18 something else?</p> <p>19 A Correct. I mean, that means going down to the</p> <p>20 shaker, sticking your hand in the stuff coming out,</p> <p>21 feeling it, smelling it, knowing what it is.</p> <p>22 Q And is there any kind of manual or checklist that</p> <p>23 tells you what to do for different types of</p> <p>24 formation or is that just kind of experience-based?</p> <p>25 A Most it is experience-based, but I do think there's</p>	<p style="text-align: right;">124</p> <p>1 some general knowledge out there that says, you</p> <p>2 know, sand is typically low RPM, high weight.</p> <p>3 Shell is typically high RPM, low weight, but it's</p> <p>4 all situational. You know, you can run into sand</p> <p>5 that doesn't do what the book says, so you have to</p> <p>6 change it.</p> <p>7 Q Is it, too, when the reamer comes up out of the</p> <p>8 hole, part of your job, too, is to grade the, I</p> <p>9 guess, the cutters that come out?</p> <p>10 A Yeah.</p> <p>11 Q And the wear that's on them?</p> <p>12 A Your terminology is better than mine, so you've</p> <p>13 been speaking to somebody.</p> <p>14 MR. ST. PE':</p> <p>15 I have a feeling this is not his first</p> <p>16 reamer hand deposition.</p> <p>17 THE WITNESS:</p> <p>18 Cause I never said strap when mentioned</p> <p>19 tools, and he has.</p> <p>20 A But, yes.</p> <p>21 BY MR. BOWDLER:</p> <p>22 Q It seems to be a pretty common phrase, --</p> <p>23 A It is. It is, but yes, I do a dull grade on every</p> <p>24 tool coming out.</p> <p>25 Q And then that's to help determine, I guess, if you</p>

<p style="text-align: right;">125</p> <p>1 were in between runs, can you run the tool, again, 2 do you need to switch it out, -- 3 A Correct. 4 Q -- things like that? 5 A Most of the time, you change it out no matter what, 6 but that tells you what size hole you have, so if 7 you've eaten an inch out of your blades, that means 8 your hole's an inch lower. 9 Q Okay. And for the grading, do you have -- is there 10 any kind of guide or like manual you -- I guess a 11 visual comparison where you say this is good 12 enough, this is -- you know, I can use this, 13 again -- 14 A There's an IDHC standard for grading and you use 15 that to grade it. It's both a visual and a 16 measurement-type -- like actually stick a little 17 measurement on there and measure every tooth. 18 Q You had mentioned before that there was kind of a 19 general manual for the tool. Any other documents 20 or kind of manuals that you had out there on the 21 rig to help you with your job? 22 A No, not that I recall. 23 Q I just kind of want to check, is this a copy of the 24 manual you were mentioning? 25 A (Reviewing document.) I believe this is the thing</p>	<p style="text-align: right;">126</p> <p>1 I submitted, right? 2 Q I know you definitely submitted one. 3 A This is the document I was referring to, but it is 4 very loosely written, I guess. It tells you all 5 the basics, yes. 6 Q Those are the basics. 7 (REPORTER'S NOTE: 8 Whereupon a document was marked for 9 identification as "Exhibit 15," and same is 10 attached hereto at the end of the deposition.) 11 BY MR. BOWDLER: 12 Q I just wanted you to kind of confirm that. I'm not 13 gonna ask you anything specific. 14 A Oh, yes, this is the -- the operating guide that 15 came with it. 16 MR. BOWDLER: 17 I'm just gonna hand you what we're gonna 18 mark as Exhibit 16. 19 (REPORTER'S NOTE: 20 Whereupon a document was marked for 21 identification as "Exhibit 16," and same is 22 attached hereto at the end of the deposition.) 23 BY MR. BOWDLER: 24 Q Is this the -- kind of the form you were talking 25 about where you had to keep track kind of the half</p>
<p style="text-align: right;">127</p> <p>1 hour by half hour of everything that's going on? 2 A (Reviewing document.) Yes. So this was just 3 the -- a generic, this is what we did today type 4 thing. 5 Q Right. 6 A Yes, and some things are as little as by the half 7 hour. Some things are six hours, depending on 8 who's doing it. 9 Q Right, and so depending on the activity, so for 10 example, just where it says make a BHA on the first 11 page, it says -- you know, that took you an hour to 12 make a new BHA and just, you're kind of going 13 through it, keeping track? 14 A Correct. 15 Q And then just kind of, so I'm familiar with these 16 forms, all the entries where it talks about ream 17 from a depth of number to another number, -- 18 A Uh-huh (yes). 19 Q -- that's when you guys are drilling? 20 A That is when you're drilling, yes. 21 Q And then, just so I -- again, cause I'm -- T-I-H, 22 does that stand for trip in hole? 23 A Trip in hole. 24 Q Okay, and at the end there, it's the -- basically, 25 POOH, like Winnie-the-Pooh?</p>	<p style="text-align: right;">128</p> <p>1 A Pull out of hole. 2 Q Pull out of hole, okay. And while the reamer is 3 pulling out of the hole, what does your job entail 4 during that time period? 5 A So it -- you know, it depends. I mean, if you look 6 at this one, it was a two-hour trip, so when you 7 start pulling, halfway up, once you reach the 8 casing, you have to do another pooh test to make 9 sure your reamer was open the whole time. So 10 during that two hours, I did a pooh test and then 11 you have to watch it go through the BOPs. You have 12 to watch it go through any other restrictions and 13 then you have to be there when it's on top. 14 Q When it comes up out of the hole? 15 A Yeah, so -- and then if there's any other things I 16 need to do on the rig floor, I do it during that 17 time, too. You know, like, if we're pulling out 18 the hole, it's for a reason. We're probably 19 picking up a new one, so I'm already prepping the 20 next tool to go up. So in this situation, when we 21 pull out the hole, that was actually the end, cause 22 you -- I can see -- you know, I pumped the sweep, 23 circulate it, pull it out the hole, lay down BHA 24 and I leave location. 25 Q Right, and --</p>

<p style="text-align: right;">129</p> <p>1 A This is a shelf rig, that's why it's so fast.</p> <p>2 Q And you said this is a shelf rig?</p> <p>3 A A Hercules 201 is a jackup rig.</p> <p>4 Q A jackup rig, okay.</p> <p>5 A So, typically, close to the shore.</p> <p>6 Q So just, if you can turn on the second page?</p> <p>7 A (Complying.)</p> <p>8 Q So just kind of curious, so there's a lot of</p> <p>9 entries at the start of it where after you arrive</p> <p>10 and you fly out, it says:</p> <p>11 (Reading) Locate strap and prep tools.</p> <p>12 Then it says:</p> <p>13 (Reading) Still drilling section, standby.</p> <p>14 So what was going on during that time period,</p> <p>15 again, to the extent you can remember?</p> <p>16 A So on this location, we arrived early, so they were</p> <p>17 still drilling the previous section. So during</p> <p>18 that time, that's when I was doing still -- all the</p> <p>19 other stuff. That's when I'm planning, talking</p> <p>20 with all the other tool hands, prepping the BHA.</p> <p>21 Like all this stuff that -- you know, where it</p> <p>22 says, you know:</p> <p>23 (Reading) Pick up BHA.</p> <p>24 That took hours and hours of getting it</p> <p>25 together before you actually pick it up. But yeah,</p>	<p style="text-align: right;">130</p> <p>1 so. And where it says:</p> <p>2 (Reading) Sweep.</p> <p>3 The reason why it was taking so long is cause</p> <p>4 the rig was having problems. Cause if you pump a</p> <p>5 sweep, that means you're losing mud somewhere,</p> <p>6 which is dangerous, so you're like preventing a</p> <p>7 blowout. That's what they was doing. See right</p> <p>8 here, it says:</p> <p>9 (Reading) Bringing mud weight up due to</p> <p>10 increased gas.</p> <p>11 If your gas pressure is heavier than your mud</p> <p>12 weight, that's not good.</p> <p>13 Q All right, if you could just -- I have a question.</p> <p>14 Turning the page, it's got -- it's got a number in</p> <p>15 the bottom right-hand corner, it'll say 1652?</p> <p>16 A Okay.</p> <p>17 Q And then there's a reference to running casing.</p> <p>18 That's where they're literally lowering like the</p> <p>19 pipe down to the --</p> <p>20 A Correct.</p> <p>21 Q -- okay. And while the rig is running casing, what</p> <p>22 are you doing? Is -- again, you're strapping tools</p> <p>23 getting ready for the next run?</p> <p>24 A Let me look at the next day. So right here, they</p> <p>25 were running casing. This is -- this is a job</p>
<p style="text-align: right;">131</p> <p>1 where I ran multiple tools in this string. If you</p> <p>2 look at the next page, each job?</p> <p>3 Q Uh-huh (yes).</p> <p>4 A So you see this is job number 437802, this one's</p> <p>5 439709, I never left the rig. So while they was</p> <p>6 running casing, I was prepping for the next BHA.</p> <p>7 Cause if you look on the next page, it's the same</p> <p>8 date and I started completely all over, again.</p> <p>9 Q When you said -- when -- when you referred to</p> <p>10 running multiple tools, is that -- would you run</p> <p>11 more than one reamer on the drill string at a time,</p> <p>12 or?</p> <p>13 A No, no, different size.</p> <p>14 Q Okay, different size.</p> <p>15 A So we ran the bigger one. You know, they ran</p> <p>16 casing, it might've took them two days. During</p> <p>17 those two days, that's when I'm getting -- I'm</p> <p>18 prepping all the old tools, getting them shipped</p> <p>19 out, receiving new tools for the next section and,</p> <p>20 you know, re-measuring and doing everything, again.</p> <p>21 You know, sometimes I do four tools back to back to</p> <p>22 back. And, usually, when it's in very rushed</p> <p>23 situations or -- you don't leave the rig because</p> <p>24 they don't have time to fly you back and then the</p> <p>25 next day you fly back. It's not worth the money,</p>	<p style="text-align: right;">132</p> <p>1 so they just keep you and don't let you leave.</p> <p>2 Q Okay, I don't have any other questions for you</p> <p>3 about that.</p> <p>4 A Okay.</p> <p>5 Q So when you were -- as a reamer hand, what</p> <p>6 decisions, if any, were you permitted to make with</p> <p>7 respect to the -- your tool?</p> <p>8 A So the only decisions I can -- I mean, I didn't</p> <p>9 choose what size to run. I didn't choose -- that</p> <p>10 was all done in the planning stage through the</p> <p>11 engineers. Basically, the only thing -- decisions</p> <p>12 I made were running the -- that particular tool</p> <p>13 within that tool's specifications. And anything</p> <p>14 that would fall outside that specification, you had</p> <p>15 to do a change of work form.</p> <p>16 MR. BOWDLER:</p> <p>17 If you guys don't mind, give me like 10,</p> <p>18 15 minutes. I'll just go back through my</p> <p>19 notes.</p> <p>20 MR. ST. PE':</p> <p>21 Okay.</p> <p>22 (REPORTER'S NOTE:</p> <p>23 Whereupon a short break was taken, after</p> <p>24 which the proceedings continued as follows:)</p> <p>25 MR. BOWDLER:</p>

<p style="text-align: right;">133</p> <p>1 Mr. Venable, I'm gonna hand you a</p> <p>2 document we're gonna mark as Exhibit 17 to</p> <p>3 your deposition.</p> <p>4 (REPORTER'S NOTE:</p> <p>5 Whereupon a document was marked for</p> <p>6 identification as "Exhibit 17," and same is</p> <p>7 attached hereto at the end of the deposition.)</p> <p>8 BY MR. BOWDLER:</p> <p>9 Q Okay, and this is a declaration you signed in</p> <p>10 connection with your appeal regarding your</p> <p>11 short-term disability benefits, correct?</p> <p>12 A Correct.</p> <p>13 Q And, if you would -- as you sit here today, is</p> <p>14 there anything in your declaration that's changed</p> <p>15 since the time that you signed it in 2016?</p> <p>16 A In this?</p> <p>17 Q Yes?</p> <p>18 A I didn't read the entire thing, but this was --</p> <p>19 this was done for another case, so I don't know how</p> <p>20 it pertains to this one.</p> <p>21 Q Well, just, is it true -- is it still correct? You</p> <p>22 can take your time to read it?</p> <p>23 A I mean, I remember writing it, so I didn't -- I</p> <p>24 mean, it's correct.</p> <p>25 Q Okay. And, Mr. Venable, have you prepared any kind</p>	<p style="text-align: right;">134</p> <p>1 of calculation of the amount of damages that you</p> <p>2 believe you're owed in this case?</p> <p>3 A I, personally, have not.</p> <p>4 Q Is it your belief that when you were working as a</p> <p>5 reamer hand that you should've been paid on an</p> <p>6 hourly basis?</p> <p>7 A I believe that I should've gotten overtime.</p> <p>8 Q Okay. So, Mr. Venable, have you told me the truth</p> <p>9 in response to all my questions here today?</p> <p>10 A Yes, I have.</p> <p>11 Q Okay, and as you sit here, is the any of your</p> <p>12 testimony that you feel you need to clarify or</p> <p>13 correct that you've given this morning?</p> <p>14 A Not that I know of, no.</p> <p>15 MR. BOWDLER:</p> <p>16 Okay, I don't have any other questions</p> <p>17 for you at this time. I'll hand it over to</p> <p>18 your attorney, if he has any questions for</p> <p>19 you.</p> <p>20 MR. ST. PE':</p> <p>21 Well, I do have just a few questions,</p> <p>22 which my Golden Rule is to never ask your</p> <p>23 client questions in their deposition, but I'm</p> <p>24 gonna break it for the first time, only for</p> <p>25 clarification purposes.</p>
<p style="text-align: right;">135</p> <p>1 EXAMINATION BY MR. ST. PE':</p> <p>2 Q Could you look at Exhibit 14 that you referred to?</p> <p>3 A (Complying.) Okay.</p> <p>4 Q And I just want to go through some of the items and</p> <p>5 make sure I understand what you believe these</p> <p>6 things are. So if you go towards the bottom under,</p> <p>7 "essential responsibilities and duties," there's</p> <p>8 something called:</p> <p>9 (Reading) Develops technical knowledge and</p> <p>10 design and evaluation working closely with the</p> <p>11 mentor.</p> <p>12 Can you explain to me what that means, to you?</p> <p>13 A That just -- to me, just means learn your job to</p> <p>14 the best of your ability and, you know, it says:</p> <p>15 (Reading) Working with a mentor.</p> <p>16 But I've never been assigned a mentor or</p> <p>17 anything like that.</p> <p>18 Q All right, the next item underneath it is:</p> <p>19 (Reading) Work with manager to prepare for</p> <p>20 future career options.</p> <p>21 What does that mean?</p> <p>22 A So Schlumberger had this quest stuff that you see a</p> <p>23 couple sentences before, it's basically just saying</p> <p>24 that it's your career path, you know, from -- see,</p> <p>25 right here, it says:</p>	<p style="text-align: right;">136</p> <p>1 (Reading) DT&R field specialist.</p> <p>2 But there's actually multiple levels of that.</p> <p>3 There's one, two, three, four, so it's just saying</p> <p>4 that you're gonna work with your manager to try and</p> <p>5 progress. Schlumberger was a company that believed</p> <p>6 if you're not moving up, you're not going nowheres,</p> <p>7 I guess.</p> <p>8 Q All right:</p> <p>9 (Reading) Stands in for FSM when on vacation.</p> <p>10 What is that?</p> <p>11 A I don't even know what FSM is.</p> <p>12 Q Okay:</p> <p>13 (Reading) Coaches and mentors less-experienced</p> <p>14 employees acts as a role model for all field</p> <p>15 operations people.</p> <p>16 What does that mean to you?</p> <p>17 A I guess it just means create a good example for</p> <p>18 other people. I've never been in charge of</p> <p>19 coaching and I've never been assigned as a mentor</p> <p>20 to anyone nor did I ever have a training role where</p> <p>21 I trained employees.</p> <p>22 Q Okay, and the other thing I wanted to ask you,</p> <p>23 since I've already broken my rule, is could you</p> <p>24 describe what a drilling shack is?</p> <p>25 A So a drilling shack could be -- some rigs did not</p>

<p style="text-align: right;">137</p> <p>1 even have one or it's literally just drillers on a 2 brake to the fanciest of rigs, which are very far 3 and few between, like these new drill ships might 4 have a shack probably no bigger than this room and 5 it -- you know, it has glass because it has the 6 tube -- the driller and the AD sit in a chair, and 7 everybody else just stands around it and that's it. 8 There's no tables, no desk, there's no nothing like 9 that. It's just a -- all it is, is basically the 10 controls for the drill crew to run the equipment. 11 Q So when you're doing something, like you described 12 trip in the hole, what are you physically doing 13 when that's going on? 14 A So, usually, I'm on the drill floor watching, you 15 know, the pipe, recording that or I'm standing 16 behind the driller with my tally book manually -- 17 so there's gauging and I'm sitting there watching 18 the same gauges that the driller is watching. 19 Q So when you were describing it earlier, I 20 envisioned you sitting in a nice, comfortable chair 21 like these chairs and -- 22 A No. 23 Q -- watching a TV monitor or a computer monitor; 24 that's not what's going on? 25 A No, it's a room that's all greasy and it's -- all a</p>	<p style="text-align: right;">138</p> <p>1 drill shack is, is the control center to run the 2 rigs. Some rigs don't even one. 3 Q All right, you're standing the entire time? 4 A Yes. 5 MR. ST. PE': 6 Okay, that's all the questions I have. 7 RE-EXAMINATION BY MR. BOWDLER: 8 Q And just a couple followup. When you're in the 9 drilling shack, again, you're standing behind the 10 driller, you're not controlling the brake or 11 anything like that? 12 A No. No one's allowed to touch it, so that's -- so 13 like BP is the oil company, they hire Transocean or 14 Hercules or something to run the actual rig. So 15 we're there just -- we're not allowed to touch none 16 of the rig, no one -- not even BP is allowed to 17 touch the rig. 18 MR. BOWDLER: 19 All right, that's my only followup. 20 A Cause there's buttons you can press and you just 21 dropped all the pipe in the hole or cut it. 22 COURT REPORTER: 23 Are y'all gonna read and sign? 24 MR. ST. PE': 25 Yes.</p>
<p style="text-align: right;">139</p> <p>1 MR. BOWDLER: 2 Mr. Venable, thank you very much for your 3 time. I appreciate it. 4 COURT REPORTER: 5 And a copy for you, Mr. St. Pe'. 6 MR. ST. PE': 7 Yes, please. 8 (DEPOSITION CONCLUDED AT 1:43 P.M.) 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">140</p> <p>1 REPORTER'S PAGE 2 3 I, SHERI BERTRAND, Certified Court Reporter, in and 4 for the State of Louisiana, the officer, as defined in 5 Rule 28 of the Federal Rules of Civil Procedure and/or 6 Article 1434(b) of the Louisiana Code of Civil 7 Procedure, before whom this sworn testimony was taken, 8 do hereby state on the record: 9 That due to the interaction in the spontaneous 10 discourse of this proceeding, dashes (--) have been used 11 to indicate pauses, changes in thought, and/or 12 talkovers; that same is the proper method for a court 13 reporter's transcription of proceeding; that the dashes 14 (--) do not indicate that words or phrases have been 15 left out of this transcript; and that any words and/or 16 names which could not be verified through reference 17 material have been denoted with the phrase "(ph.sp.)." 18 19 20 21 22 23 24 25</p>

<p style="text-align: right;">141</p> <p>1 CERTIFICATE</p> <p>2</p> <p>3 THIS CERTIFICATION IS VALID ONLY FOR A TRANSCRIPT</p> <p>4 ACCOMPANIED BY ORIGINAL SIGNATURE AND ORIGINAL REQUIRED</p> <p>5 SEAL ON THIS PAGE.</p> <p>6 I, SHERI BERTRAND, CERTIFIED COURT REPORTER,</p> <p>7 CERTIFICATE NUMBER 27004, IN AND FOR THE STATE OF</p> <p>8 LOUISIANA, AS THE OFFICER BEFORE WHOM THIS TESTIMONY WAS</p> <p>9 TAKEN, DO HEREBY CERTIFY THAT JACK VENABLE, JR., TO WHOM</p> <p>10 OATH WAS ADMINISTERED, AFTER HAVING BEEN DULY SWORN BY</p> <p>11 ME UPON AUTHORITY OF R.S. 37:2554, DID TESTIFY AS</p> <p>12 HEREINBEFORE SET FORTH IN THE FOREGOING 139 PAGES; THAT</p> <p>13 THIS TESTIMONY WAS REPORTED BY ME IN THE STENOMASK</p> <p>14 REPORTING METHOD, WAS PREPARED AND TRANSCRIBED BY ME OR</p> <p>15 UNDER MY PERSONAL DIRECT SUPERVISION, AND IS A TRUE AND</p> <p>16 CORRECT TRANSCRIPT TO THE BEST OF MY ABILITY AND</p> <p>17 UNDERSTANDING; THAT THE TRANSCRIPT HAS BEEN PREPARED IN</p> <p>18 COMPLIANCE WITH TRANSCRIPT FORMAT GUIDELINES REQUIRED BY</p> <p>19 STATUTE OR BY RULES OF THE BOARD, AND THAT I AM INFORMED</p> <p>20 ABOUT THE COMPLETE ARRANGEMENT, FINANCIAL OR OTHERWISE,</p> <p>21 WITH THE PERSON OR ENTITY MAKING ARRANGEMENTS FOR</p> <p>22 DEPOSITION SERVICES; THAT I HAVE ACTED IN COMPLIANCE</p> <p>23 WITH THE PROHIBITION ON CONTRACTUAL RELATIONSHIPS AS</p> <p>24 DEFINED BY LOUISIANA CODE OF CIVIL PROCEDURE ARTICLE</p> <p>25 1434 AND IN RULES AND ADVISORY OPINION OF THE BOARD;</p>	<p style="text-align: right;">142</p> <p>1 THAT I HAVE NO ACTUAL KNOWLEDGE OF ANY PROHIBITED</p> <p>2 EMPLOYMENT OR CONTRACTUAL RELATIONSHIP, DIRECT OR</p> <p>3 INDIRECT, BETWEEN A COURT REPORTING FIRM AND ANY PARTY</p> <p>4 LITIGANT IN THIS MATTER NOR IS THERE ANY SUCH</p> <p>5 RELATIONSHIP BETWEEN MYSELF AND A PARTY LITIGANT IN THIS</p> <p>6 MATTER. I AM NOT RELATED TO COUNSEL OR TO THE PARTIES</p> <p>7 HEREIN, NOR AM I OTHERWISE INTERESTED IN THE OUTCOME OF</p> <p>8 THIS MATTER.</p> <p>9 IN WITNESS WHEREOF, I HAVE HEREUNTO AFFIXED MY</p> <p>10 SIGNATURE AT LAKE CHARLES, LOUISIANA, THIS THE ____ DAY</p> <p>11 OF OCTOBER, 2019.</p> <p>12</p> <p>13 _____</p> <p>14 SHERI BERTRAND #27004</p> <p>15 CERTIFIED COURT REPORTER</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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